
Planning Statement

Hayes Town Centre Estate

Hybrid Planning Application

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Executive Summary

LBH wants to ensure that Hayes Town Centre Estate is a good place to live for existing residents and future generations and as a result are proposing to regenerate the existing estate through comprehensive redevelopment. The scheme is coming forward in partnership with Hayes Town Centre Estate residents, to deliver high quality homes across a mix of unit types and within a newly revitalised neighbourhood.

The Hybrid Planning Application will provide the strategic framework for the estate's redevelopment – securing the following benefits:

- I. Delivery of more homes, of which 51.7% (based on floorspace) will be affordable housing;
- II. Replacement of all existing affordable homes in the form of Social Rent Tenure units with an additional commitment to new London Affordable Rent Tenure units, allowing current residents to return to the estate and providing homes for other residents on LBH's housing register;
- III. Tenure blind approach to facilitate a genuinely mixed and inclusive community, with a high standard of design throughout all tenure types;
- IV. Delivery of high quality and well-lit public realm and green space that includes a new Community Square, as well as improved access routes and gateways;
- V. Net increase in provision of community facilities across the Site, both in quality and quantum terms. This will include the provision of a larger, flexible and modern community room to replace that previously at the ground floor of Skeffington Court as well as new public open space incorporating facilities for recreation and play.
- VI. Provision of affordable renewable energy sources and highly efficient homes;
- VII. Well insulated homes with opportunities for both natural ventilation and active cooling to ensure the residents are both acoustically and thermally comfortable throughout the year;
- VIII. Net increase in play space across the entirety of the Site, both in quality and quantum terms;
- IX. Comprehensive landscape and tree planting strategy alongside substantial public realm improvements, to include the Site's frontage onto the Grand Union Canal, that will result in biodiversity and ecological net gain on the Site as well as enhancements within the Blue Ribbon Network;
- X. Enhanced and legible connections to the wider street network with a new east – west link through the development, providing pedestrian access onto Crown Close and the High Street beyond; and
- XI. Incorporation of sustainable urban drainage systems to include rain gardens.

This Planning Statement explores the Proposed Development in more detail, describing the physical context of the Site itself; any relevant planning history; and the pre-application consultation and engagement process; before examining the Proposed Development within the context of the relevant planning policy.



In summary, the Illustrative Masterplan proposed will ensure the creation of 500 homes overall, comprising a replacement of the 260 homes currently on the Site alongside an uplift of 240 homes. These will be delivered as a mix of sizes, of which more than 51.7% (based on floorspace) will be affordable and within five distinct development zones, shown indicatively to comprise 10 residential blocks. The design of these blocks has been sensitively devised to reflect and respect the varied heights, character and articulation of the surrounding context. As part of this Hybrid Planning Application, Blocks A and B are proposed in detail and will comprise a combined 80 residential units as part of the Detailed First Phase.

Alongside the residential element, up to 140 square metres of non-residential floorspace is proposed along key frontages of new public open space which represents an increase above the current provision. As part of this there will also be an uplift in community floorspace in qualitative terms.

As set out in this Planning Statement it is concluded that the Proposed Development complies with the Development Plan for the Site as well as other material considerations to include national planning policy guidance and sits fully within the context of LBH's aspirations for the regeneration of Hayes Town Centre Estate. It will represent sustainable growth and provide wider environmental, social and economic benefits through the optimisation of an existing residential estate.

1. Introduction

- 1.1. This Planning Statement has been prepared by Savills on behalf of the Applicant, London Borough of Hillingdon (“LBH”) in support of a Hybrid Planning Application (“HPA”) for the regeneration of the Hayes Town Centre Estate, Hayes, London, UB3 3DN (“the Site”). The Site falls within the administrative area of the London Borough of Hillingdon and therefore the LBH Local Planning Authority (“LBH LPA”) will determine the planning application. Enclosed at Appendix 1 is a Site Location Plan to show the full extent of the red line boundary in relation to this HPA.
- 1.2. This Statement describes the application proposals in detail and assesses the proposals against the relevant planning policy framework. It should be read in conjunction with the accompanying Application Drawings, Parameter Plans and a number of specialist technical documents and information which have been prepared and submitted as part of this HPA to address the full range of planning considerations. Lists of the submitted documents and drawings are provided at Appendices B and C of the submitted Development Specification Statement (December 2021) which forms part of the HPA.

Description of Development

- 1.3. The formal Description of the Development for which planning permission is being sought (“the Proposed Development”) is as follows:

“Development in outline (with all matters reserved) for residential floorspace (Class C3) to comprise: demolition of all existing buildings and structures; erection of new buildings; provision of a community centre (up to 140 sqm of Use Class F2(b) floorspace); new pedestrian and vehicular access; associated amenity space, open space, landscaping; car and cycle parking spaces; plant, refuse storage, servicing area and other works incidental to the proposed development; and

Detailed planning consent for Blocks A and B comprising 80 residential units (Class C3); new pedestrian and vehicular access; associated amenity space and landscaping; car and cycle parking; refuse storage, servicing area, and other associated infrastructure to include temporary highways and landscaping works”.

Structure of Hybrid Planning Application and Supporting Documents

- 1.4. This Application is being submitted as a hybrid proposal which seeks planning permission for the development of 500 residential units overall. It comprises elements in detail (the Detailed First Phase) and in outline (the Outline Area).
- 1.5. The detailed element comprises 80 residential units which will come forward across two blocks in addition to new pedestrian and vehicular access; associated amenity space and landscaping; car and cycle parking; refuse storage, a servicing area, and associated infrastructure to include temporary highways and landscaping works.

- 1.6. The outline component (appearance, landscaping, layout and scale, and access reserved) relates to the development of 420 units including car and cycle parking and open space. These elements are defined on Parameter Plan 2 – Development Zones (ref: HTC-PTE-ZZ-XX-DR-A-10011), whereby the area within the dotted red line comprises the Detailed First Phase and the remainder of the Site, within the wider HPA solid red line boundary, comprises the Outline Area.
- 1.7. The Detailed First Phase is being submitted in full and sits outside the outline parameters. However, the detailed design has been developed in conjunction with the outline parameters and principles to ensure overall a comprehensive approach to the redevelopment of the Hayes Town Centre Estate (“the Estate”) in line with LBH’s vision. The Detailed First Phase of the HPA seeks planning permission for 5,948 square metres GIA¹ within Blocks A and B at the northern end of the Estate. Block A fronts Pump Lane and extends south along the existing Austin Road and Block B sits to the south, fronting Crown Close and a new internal estate road. There is no non-residential floorspace proposed within the Detailed First Phase, only residential and the distribution of the proposed floorspace is detailed further in Section 4 of this Statement. In providing this first phase as the detailed element of the hybrid proposals, and subject to securing planning consent, it provides a means of kick-starting the regeneration of the Estate at the earliest opportunity, further supporting the decant and rehousing of the first phase of existing residents.
- 1.8. The Outline Area is being submitted with all matters reserved. Notwithstanding this, an illustrative scheme has been prepared across the Outline Area to demonstrate one way in which the outline components could come forward in line with the parameters, as set out in the submitted Development Specification Statement. The Outline Area of the HPA will be delivered as a phased development across the four remaining Development Zones. Based on the Illustrative Masterplan this has the potential to comprise eight blocks (C – J) plus a series of Mews Houses (identified as Block K), providing 28,585 square metres of residential floorspace (GIA) and up to 140 square metres of community floorspace (Use Class F2(b)) creating a combined maximum GIA of 28,725 square metres.
- 1.9. Both the Outline Area and the Detailed First Phase combined form “the Hayes Town Centre Illustrative Masterplan”. This has been submitted as part of the HPA for indicative purposes only and is based upon the proposed parameters. It therefore sits within the envelope of development assessed as part of the HPA.
- 1.10. As noted above, the Development Specification Statement submitted alongside this Planning Statement provides further information regarding the maximum parameters, tolerances, thresholds and fixes sought for approval under the HPA for the Outline Area. Appendices B and C of the Development Specification Statement also provide comprehensive lists of the supporting documents and drawings (respectively) submitted as part of this HPA and identify those for approval, planning information and for illustrative purposes. In summary, these can be grouped

¹ Notes: All figures are in GIA format, and reflective of floorspace within each dwelling unit to represent those areas usually occupied by people i.e. habitable spaces. Therefore, plant rooms, car / cycle parking areas, ancillary stores, cores, stairwells, corridors and circulation routes, and spaces for on-site energy generation are excluded from these calculations. All floor area figures cited are maximums, with the final total provision to not exceed these unless an amendment to this HPA is regularised in future

as follows:

Documents, Plan and Drawings for Approval

- I. Parameter Plans, to include:
 - Land Uses
 - Development Zones
 - Building Heights
 - Access and Movement
 - Hard and Soft Landscape

- II. Detailed First Phase Application Drawings, to include:
 - Proposed Site and Block Plans
 - Proposed Floorplans
 - Proposed Elevations
 - Proposed Sections
 - Detailed Access Drawing
 - Landscape Plans
 - Temporary Works Plan

Supporting Information

- III. Planning Documents, to include this Planning Statement and the Development Specification Statement

- IV. Design Documents, to include the Design and Access Statement

- V. Existing Site Plan and Drawings

- VI. Illustrative Masterplan

- VII. Contextual and Illustrative Drawings

- VIII. Illustrative Landscape Strategy

- IX. Technical Impact Assessments

X. Financial Viability Assessment

XI. Indicative Demolition Plan

XII. Indicative Phasing Plan

Structure of this Statement

1.11. This Statement is broken down into the following sections:

- **Section 2** provides the background to the Site and its context within the surrounding area, as well as an overview of the relevant planning history;
- **Section 3** sets out the pre-application consultation and engagement undertaken during the preparation of the scheme;
- **Section 4** provides a summary of the Proposed Development;
- **Section 5** sets out the relevant planning policy framework for the Site;
- **Section 6** demonstrates the conformity of the Proposed Development with Planning Policy;
- **Section 7** sets out the Unilateral Undertaking Heads of Terms; and
- **Section 8** presents our conclusions in respect to the Proposed Development, to include a summary of the socio-economic and environmental benefits of the proposals.

2. Background

The Applicant

- 2.1. The proposals have arisen as a result of LBH's stated desire to regenerate the existing Estate in order to provide existing residents and future generations with high quality and affordable homes as well as provide a good place to live through new and improved public realm, external amenity and green infrastructure. The Site forms part of site allocation SA23 within LBH's Local Plan Part 2 (2020) which provides a catalyst for the regeneration of the existing Estate along with surrounding former industrial sites to the west to significantly contribute to the delivery of much needed new housing stock across the borough.
- 2.2. LBH has made it clear that it considers this Site to be a vital first part of that longer term estate regeneration programme and the Applicant is delighted to be able to put forward these proposals as a means of helping to kick-start that process through Hayes Town Centre regeneration.

The Site

- 2.3. The Site comprises 2.5 hectares and is occupied by the existing Estate which is comprised principally of medium rise blocks of flats and maisonettes/duplexes at a height of 3-4 storeys, with a high-rise element of 15 storeys, known as Skeffington Court, located within the south eastern part of the site. The existing Estate was built in the 1970's and contains 260 homes made up of a mix of 1, 2 and 3 bedroom units across a range of tenures as set out below in Tables 1 and 2. This is in addition to 115 square metres of community space in the form of a dedicated room at the ground floor of Skeffington Court.

Table 1: Existing Housing Mix by Tenure

Existing Housing Tenure Mix	Number
Affordable / Social Rented	181
Housing Association Rented	18
Resident Home Owners (leaseholders)	33
Non-resident Home Owners (Absentee Landlords)	28
AFFORDABLE TOTAL	199
OVERALL TOTAL	260

Table 2: Existing Unit, Habitable Room and Floorspace Split

	1 Bed	2 Bed	3 Bed	4 Bed	Total	Total GIA
<i>Affordable / Social Rented / Housing Association Rented</i>						
Units	93	94	12	0	199	12,177
Hab Rooms	279	376	60	0	715	
Floorspace (sq.m) GIA	4,477	6,512	1,188	0	12,177	
<i>Private Leasehold</i>						
Units	23	27	11	0	61	4,057
Hab Rooms	69	108	55	0	232	
Floorspace (sq.m) GIA	1,081	1,913	1,063	0	4,057	

- 2.4. The western and southern parts of the Estate are located within the Hayes Town Centre boundary, which has a district-wide role as a focal point for convenience goods and services as well as public transport links. The Site is bordered to the north by Pump Lane; to the east by two storey semi-detached dwellings fronting Little Road, as well as commercial and light industrial/warehouse units; to the south by Western View and the Grand Union Canal; and to the west by Crown Close.
- 2.5. Vehicular access is provided off Pump Lane via Austin Road which extends the full length of the Site, running along the eastern boundary. Car parking for existing residents is primarily provided within closed car parking areas located at the ground floor of the existing residential blocks. These are estimated to provide 223 parking spaces on-site (equating to 0.86 spaces per unit). In addition, there are 45 on-street parking spaces within the area of study which equates to 1.03 spaces per unit when considered alongside the on-site provision. The parking arrangements for the Estate are run on a permit basis and it is understood that approximately 110 existing residents have parking permits with a number of residents choosing not to use the enclosed parking areas due to safety concerns.
- 2.6. Pedestrian connections between the Site and its surroundings are limited to the primary access off Pump Lane to the north, a central east-west underpass that runs through the Site and a raised east-west walkway at the southern end, along Western View. Internally within the Site, pedestrian movement is north-south orientated along the boundaries and via a semi-private raised walkway which runs through the centre of the existing Estate and is gated at both ends.
- 2.7. With reference to the Environment Agency's ("EA") Flood Map for Planning, the Site is located within Flood Zone 1 and therefore has a low probability of flooding.

- 2.8. There are no local or statutorily Listed Buildings within the Site's red line boundary and the Site itself is not located in a designated conservation area. However, there are a number of heritage assets within close proximity, this includes Silverdale Road Warehouse (locally listed and formerly a chair factory built in 1907) to the east and the Old Crown Public House (Grade II listed building) to the west.
- 2.9. There are no Tree Preservation Orders ("TPO's") within the Site or in the immediate surroundings.

Surrounding Area

- 2.10. The Site lies within an established urban area within Hayes Town Centre. It is located to the west of the main high street of Hayes Town Centre, in the form of Station Road, which sits immediately to the east of Crown Close. This is a mixed use area, comprising a range of local shops and services as well as other typical town centre uses all focused at ground floor with residential above. Botwell Green Sports and Leisure Centre sits at the northern end of the high street with the surrounding area immediately to the east and west comprising predominantly residential uses. The area becomes increasingly industrial and commercial in nature as it expands east and west of the town centre respectively.
- 2.11. A major redevelopment, Highpoint Village, is located to the immediate south of the Site, on the southern side of the Grand Union Canal. This extends to nine storeys across four residential blocks. This is a Ballymore development comprising 576 residential apartments along with retail and hotel uses. It was completed in 2011 (ref.10057/APP/2007/3674).
- 2.12. Detailed planning permission was granted in July 2019 for residential redevelopment of the adjoining Silverdale Industrial Estate (which forms part of the wider site allocation SA23) (ref. 71374/APP/2016/4027) to provide 122 residential units and 230sqm of flexible commercial floorspace across buildings of between four and nine storeys. The residential redevelopment of Chailey Industrial Estate which lies less than 100 metres to the east of the Estate was approved in October 2019 (ref. 2102/APP/2018/4231). The proposals for the Chailey Industrial Estate comprised the development of three buildings ranging from 2 to 10 storeys in height and delivering 331 residential units as well as 710 square metres of ground floor commercial floorspace. These nearby schemes are both under construction and set a notable height precedent for considering new heights as part of the proposals alongside the backdrop of already established existing heights across the Estate. As such, the immediate surrounding area is set to undergo a significant change in character, and this transformation will see the introduction of increased heights in close proximity to the Estate.
- 2.13. The Site is well located in terms of access to the town centre medical amenities. There are three health facilities within the vicinity of the Site including HESA Medical Centre which is located approximately 450m (6 minute walk) from the Site on Station Road; a Pharmacy approximately 400m (5 minute walk) from the Site on Station Road; and, Hayes Dental Practice approximately 650m (8 minute walk) from the Site, also located on Station Road.
- 2.14. In terms of local education and childcare provision, Kiddiecare Nurseries Botwell is located approximately 450m (6 minute walk) from the Site on Botwell Lane; Botwell House Roman Catholic Primary School is located

approximately 450m (6 minute walk) north-east of the Site; whilst, Minet Infant/Junior School is located approximately 1.6km (19 minute walk) north of the Site. The Hayes Community Campus associated with Uxbridge College is located approximately 1.6km (20 minute walk) north of the Site.

- 2.15. Within the surrounding area there are a number of public open green spaces. These include Botwell Green Sports and Leisure Centre (approximately 400m to the northwest), Lake Farm Country Park (approximately 600m to the northwest), Minet Country Park (approximately 800m to the northeast) and Crane Meadows (1.2km to the south). Airlinks Golf Club is located approximately 1.4km to the southeast.
- 2.16. Hayes & Harlington train station is approximately 0.3 miles to the south, providing direct services to London Paddington, Heathrow Airport and Reading. It is also situated on the Crossrail route which, once completed, will provide 10 services per hour facilitating direct travel to Essex and central and southeast London. With regard to road links, the Site is situated approximately 0.4 miles north west of the A312, which connects to the A40 and the M4, both of which provide access to the M25. The prime town centre location of the Estate means it is within close proximity to extensive public transport infrastructure and lends itself to a very good Public Transport Accessibility Level (PTAL), of between 4 and 5, with the higher rating achieved toward the Site's southern edge, based on the appointed transport consultant's manual PTAL calculation (noting TFL's 2031 forecast of entirely PTAL 4-5 for the Estate as a whole).
- 2.17. There are a significant number of established bus routes available within a 3 minute walk of the Estate, providing access to a range of destinations across London. The nearest paired bus stops are located on Station Road, known as 'Hayes Town' and between them provide 12 different services, to include routes to Heathrow Airport, Uxbridge and Northolt. The full extent of services and the frequency of these is detailed further within the submitted Transport Assessment which demonstrates that there is a comprehensive existing bus network that serves the Estate and provides access to much of north-west London, as well as central London.
- 2.18. The railway line serving Hayes and Harlington train station runs east - west to the south of the Site and crosses the Grand Union Canal to the south east of the Site. The area to the south of the railway is mixed in use with residential terraces, industrial units, and an Asda superstore.
- 2.19. In terms of the surrounding historical context, slightly further afield, is Benlow Works, a four storey Grade II listed Victorian industrial building, which is located to the east of the Site along Silverdale Road. Parish Church of St Anselm, a Grade II listed building is located to the west, beyond Station Road. Further to the south east and west there are two Conservation Areas, Botwell Nestles and Botwell Thorn, respectively; both sit beyond the canal and are some distance from the Site.

Planning History

- 2.20. A review of Hillingdon Council's public access system from the last 32 years has not identified any site specific applications considered relevant to the potential redevelopment of the Site.

- 2.21. However, in terms of the Site's immediate context, as noted above, detailed planning permission was granted in July 2019 for the redevelopment of Site B (under SA23), at the Silverdale Industrial Estate, to include the demolition of existing buildings and erection of 122 residential units and 230sqm of flexible commercial floorspace (ref: 71374/APP/2016/4027).
- 2.22. Detailed planning permission was also granted in October 2019 for the residential redevelopment of Chailey Industrial Estate, Pump Lane which lies less than 100 metres to the east of the Estate (ref: 2102/APP/2018/4231). The proposal comprises the development of three buildings ranging from 2 to 10 storeys in height and delivering 331 residential units as well as 710 square metres of ground floor commercial floorspace.
- 2.23. In December 2020, a 400 unit mixed-use redevelopment proposal at Fairview Business Centre, Clayton Road was approved, consenting a density of 235 dwellings / ha (ref: 58758/APP/2019/3517). This scheme divides the 1.7 ha plot into two adjacent blocks, each with a mixture of apartment buildings and houses which comprise of heights ranging between 3 and 10 storeys with associated open space and public realm.

3. Consultation and Engagement

- 3.1. This section provides a summary of the extensive pre-application consultation and engagement undertaken by the applicant prior to the submission of this HPA. Further details about the resident and wider community engagement process is provided within the submitted Statement of Community Involvement (“SCI”) and should be referred to for full details, with a summary only provided below.

Planning Guidance and Policy Context

- 3.2. The importance of pre-application consultation and engagement and frontloading is emphasised in the National Planning Policy Framework (“NPPF”) (July 2021) and in the accompanying Planning Practice Guidance (“PPG”). The NPPF highlights that there is significant potential to improve the efficiency and effectiveness of the planning application system for all parties through early engagement. NPPF 39 states:

“Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.”

- 3.3. The NPPF urges local planning authorities to encourage developers to engage with them prior to the submission of a planning application. It also encourages engagement with local communities.

- 3.4. The PPG similarly encourages pre-application consultation and engagement. It states that the approach to pre-application engagement needs to be tailored to the nature of the proposed development and the issues to be raised. Having regard to this clear guidance, the Applicant has undertaken extensive pre-application consultation with existing residents; the local community; LBH LPA Planning, Design and Technical Officers; the Greater London Authority (“GLA”); and other key statutory and local stakeholders to include LBH LPA Councillors, Transport for London (“TFL”) and Heathrow Aviation Authority.

- 3.5. Following the national lockdown enforced as a result of the coronavirus pandemic in March 2020, the Chief Planner wrote to local authorities to advise them on how to maintain the planning process during the unprecedented restrictions. As is evident from this Section and the supporting documents to include the SCI, Design and Access Statement and Transport Assessment in particular, the applicant has endorsed this guidance and undertaken meaningful consultation throughout. The letter stated:

“We ask you to take an innovative approach, using all options available to you to continue your service. We recognise that face-to-face events and meetings may have to be cancelled but we encourage every opportunity to use technology to ensure that discussions and consultations can go ahead.”

Case for Regeneration

- 3.6. As required by London Plan Policy H8, and the Mayor's Good Practice Guide to Estate Regeneration (February 2018), a full and thorough review of the differing levels of physical intervention was undertaken prior to any pre-application consultation and engagement with LBH LPA and GLA Officers or the wider community. This considered the refurbishment of the existing homes within the Estate; partial redevelopment; and full redevelopment options. The analysis took account of the scope for increasing the number of homes across the Site in contributing to identified needs; access and on-site constraints; and whether that intervention option would significantly enhance the living accommodation of existing residents on the Estate and enable the delivery of wider regeneration benefits to the surrounding area.
- 3.7. The Options Appraisal (October 2020), prepared by Savills as the Applicant's Commercial Advisor, confirmed that the existing homes are no longer fit for purpose in terms of environmental performance; space standards and accessibility; and, as such do not meet current living standards. The Appraisal identified that the full redevelopment scheme would be likely to generate significant socio economic benefits for both residents and the wider area through a more comprehensive approach to the regeneration of the Estate. Full redevelopment to include holistic redesign provides an opportunity for significant improvements to the quality of stock for a longer period of time, to include in relation to the energy and sustainability performance of dwellings, as well as improved standards of living. This is in addition to a significant uplift in the overall volume of units which is considered preferential and together these benefits justify this scale of intervention.
- 3.8. As the existing Estate is home to 260 households, a key priority for LBH has been to consider the views of existing and returning residents in making any decisions about the future of the Estate. Therefore, in parallel with the above options appraisal exercise, since the summer of 2020, LBH has undertaken extensive consultation and engagement with the existing residents of the Estate in accordance with Section 105 of the Housing Act 1985 to understand their aspirations. The engagement took the form of the following with the full redevelopment of the Site ultimately identified as the preferred option.
- A telephone survey (July 2020) which proposed a series of questions and statements for residents to respond to. The responses were recorded and compiled to show any key trends.
 - A drop-in event (August 2020) on the Estate to provide residents with the opportunity to complete the survey in person with a member of the consultation team or ask questions of the team and/or LBH.
 - A further drop-in event (September 2020) on the Estate where residents were presented with the survey findings and were able to explore the options for improving the Estate further with the consultation team and architects. The feedback from this clearly demonstrated an ambition for the full redevelopment of the estate to be considered.

- 3.9. On 22 October 2020, the Options Appraisal and feedback from initial consultation and engagement with existing residents was presented to LBH LPA's Cabinet. Members convened and voted to approve further work on the full redevelopment of the existing Estate.
- 3.10. Resident engagement continued following Cabinet approval with a number of consultation sessions held remotely between November 2020 and March 2021 (in line with the restrictions imposed as part of the response to the COVID-19 pandemic). This took the form of online meetings via Zoom with printed communications delivered to resident homes and/or via telephone. In December 2020 specifically, a booklet was published and issued to all residents outlining LBH's commitment to residents and the ballot process. It also identified key dates and project milestones. This was supplemented by a regular newsletter to keep residents up to date on the project and the establishment of a Resident Steering Group who met on weekday evenings via Zoom to discuss the emerging proposals.
- 3.11. Between April and May 2021, following design development work on the full redevelopment option of the existing Estate, to include informal and formal pre-application advice from LBH LPA Planning and Design Officers, LBH held a residents ballot. In accordance with the GLA's requirements, the proposals and re-housing offer were set out in a written Landlord Offer (as approved by LBH Cabinet) and eligible residents were provided with an opportunity to vote yes or no to the regeneration proposals. There was a high resident turnout of 90%. 79% of residents voted YES for full redevelopment of the existing Estate.
- 3.12. In November 2021, the GLA approved LBH's bid, under the Building Council Homes for Londoners Programmes 2020/2022 which includes grants for replacement homes as well as additional new homes.

Local Residents, Community & Key Stakeholders

- 3.13. Following on from the above, consultation and engagement with existing residents has continued in support of the developing proposals and as part of the formal pre-application process. This has resulted in 18 months of resident consultation pre and post ballot alongside engagement with the wider local community and key stakeholders. The key events and milestones over the last 9 months are summarised below and provided in more detail in the submitted SCI.
- I. **Resident Design Consultation Event 1:** On 17th and 18th March 2021, two drop-in consultation events were held virtually for residents of the Estate. This provided the opportunity for one-to-one conversations with the project architects and LBH Housing Officers.
 - II. **Resident Newsletter:** Alongside the dedicated events, a resident newsletter was regularly published and distributed amongst the homes on the Estate to keep residents up to date on the project.

- III. **Resident Design Workshop Event 1:** A drop-in consultation event was held on 27th July 2021 for existing Estate residents. This took place in the courtyard outside of Skeffington Court and was attended by 52 residents. The event comprised of physical exhibitions and models of the different types of new homes for residents to view and interact with. The main comments raised by resident attendees related to the proposed design, layout and appearance of the new homes as well as the Estate regeneration as a whole.
- IV. **Public Exhibition Event 1:** A drop-in event was held on 29th July 2021 in the courtyard outside Skeffington Court. A total of 19 people attended from the wider local community. The event comprised of physical exhibitions and provided an opportunity to meet the project team and understand the emerging designs. An Illustrative Masterplan and key sketch views were on display. The main comments from members of the public provided support for the regeneration of the Estate, highlighting the need for more family homes as well as the increased greening of the Estate to include the new Community Square and residential gardens.
- V. **Resident Design Workshop Event 2:** An in-person drop-in consultation event was held on 5th October 2021 which focused on the architectural appearance and feel of the emerging proposals. It was attended by 24 residents and provided information on materials; brick colours and detailing; balcony types; front gardens; and, windows. More detailed discussions on play facilities and the new Community Square also took place given residents' concerns about the lack of safe provision within the existing Estate.
- VI. **Public Exhibition Event 2:** An in-person drop-in consultation event was held on 18th November 2021 within the existing community room on the Estate. A total of 24 people attended from the wider local community. The developed Illustrative Masterplan was on display as well as key rendered views of the emerging proposals. The main comments related to the block character of the Proposed Development; the multi-functional opportunities presented by the replacement community space; the construction programme; and planting proposals.

3.14. The full details of the resident and public consultation and engagement process is set out in the submitted SCI. This includes information on the extent of engagement that has taken place; the feedback received from residents and members of the public; and, how the comments have been addressed to include a summary of design responses and confirmation of how they have been integrated where it has been feasible to do so. The consultation team is committed to keeping residents and members of the public up to date on the status of the Proposed Development, to include this HPA, and this will be achieved through on-going newsletters as well as updates to the project website. The Equality and Human Rights Impact Assessment enclosed at Appendix 4 demonstrates further how the Proposed Development will provide positive opportunities for existing residents and meet the needs of different sections of the community including those with protected characteristics.

Consultation with the Local Planning Authority

- 3.15. The scheme has been developed in light of extensive pre-application discussions held with officers at LBH LPA. Informal pre application consultation with Planning Officers on initial design proposals took place in November 2020 with the more formal pre-application engagement through a series of pre-application meetings and design / technical workshops with Planning and Design Officers from March through to October 2021. Discussions have then continued up until submission of the HPA.
- 3.16. The project team engaged directly with Officers at LBH LPA in relation to the emerging proposals, and discussions were held with Planning, Design, Arboriculture, Highways, Climate Change and Air Quality officers. Ahead of each meeting, the relevant planning, design and technical materials were submitted for officer review to allow for constructive discussions. These meetings took place on the following dates:
- Pre Application Inception Meeting – Monday 15th March 2021
 - Technical Transport Meeting – Wednesday 2nd June 2021
 - Pre Application Meeting 1 - Wednesday 16th June 2021
 - Design Review Workshop – Monday 5th July 2021
 - Pre Application Meeting 2 - Friday 27th August 2021
 - Arboricultural Site Visit – Thursday 16th September 2021
 - Pre Application Meeting 3 - Monday 27th September 2021
 - Technical Energy Meeting – Tuesday 5th October 2021
 - Technical Transport Meeting – Friday 15th October 2021
 - Technical Air Quality Meeting – Wednesday 27th October 2021
- 3.17. The Applicant was subsequently provided with formal written feedback in August 2021 after a series of pre-application meetings and which also concluded on technical matters following four meetings undertaken by that time. It provided a comprehensive response to all design and technical matters in relation to the proposals. As such, the process has been iterative with the development proposals having evolved since conception through verbal feedback and advice from Officers throughout the consultation period. Work has then continued to be undertaken by the design team to address the comments made by Officers. An explanation of how the scheme has evolved to take account of Officer feedback during the pre-application consultation process to include the Applicant's design response at each stage, is provided in Appendix 2.
- 3.18. Matters agreed / supported with / by LBH LPA Officers during the pre-application process are outlined below:
- I. Principle of residential redevelopment of the existing Estate through higher densities to achieve a significant number of new homes, to include affordable provision.
 - II. The proposed heights as well as general block layouts and configurations established through the maximum parameters.
 - III. The proposed car parking strategy, to include replacement parking provision for returning residents.

- IV. The proposed housing unit type and tenure mix for the Detailed First Phase and indicative unit size ranges for the Outline Area.
- V. The design principles for the “canal edge treatment” with illustrative materials provided as part of the HPA (within the Outline Area).
- VI. The proposed approach to the Heritage, Townscape and Visual Impact Assessment (“HTVIA”), to include agreement of viewpoints.
- VII. Street layouts and the principle of re-aligning Austin Road.
- VIII. Provision of communal and private amenity space, in the form of private gardens, balconies, terraces and courtyards as well as communal podium gardens and a public open square.
- IX. A Design Code will be secured by condition with high level design principles and a scope for the Design Code to be provided within the Design and Access Statement.

Consultation with the Greater London Authority (“GLA”)

- 3.19. A total of three formal pre-application meetings were held with the GLA between July and October 2021. The first pre-application meeting was held with the GLA on 27th July 2021. This meeting was to primarily discuss the principles of the scheme relating to the densification of the Site and the Estate regeneration process; affordable housing re-provision and new housing provision; design; tall buildings; transport; and, treatment of the canal edge. The respective formal written pre-application report received on 1st September 2021 was supportive in terms of the design approach (in terms of heights, indicative layouts, block orientation, illustrative design treatment amongst other design considerations). The affordable housing strategy was also considered acceptable in terms of re-provision based on existing affordable floorspace in the form of Social Rent with private sale tenure (over and above the re-provision) to cross subsidise the regeneration (subject to FVA review). It was considered the proposals therefore satisfy London Plan Policy H8 subject to the GLA Viability Officer’s review of the submitted FVA.
- 3.20. Subsequent to the first meeting and after additional design work, follow-up pre-application meetings were held with GLA Planning, Design and Energy Officers on 1st September and 12th October 2021. There was a further focus on the design illustration to discuss treatment of certain blocks and the canal frontage,; the Detailed First Phase of the proposals (Blocks A and B); daylight, sunlight and overshadowing matters; arboriculture; and, heritage and townscape considerations. viability, energy, landscaping and play space were also discussed and a full breakdown of the feedback provided during these sessions and the Applicant’s design response are detailed within Appendix 2.

- 3.21. A second and concluding formal written pre-application report was received on 18th November 2021. This confirmed continued support for the proposed regeneration of the estate, noting the uplift in Social Rent affordable floorspace as part of this. More detailed feedback was provided on design considerations, summarising the discussions that took place during the previous meetings and largely relating to the illustrative material coming forward in relation the Outline Area. Detailed comments on the proposed energy strategy were also provided by the dedicated GLA Energy and Sustainability Officer and reflective of the further technical discussions that had taken place with Synergy Consulting, as the project's energy and sustainability consultant. The energy measures and key sustainability principles as agreed with the Energy and Sustainability Officers at the GLA and LBH LPA have been addressed through the submitted Energy and Sustainability Assessments which support the HPA.
- 3.22. The development proposals have evolved since conception following feedback from both LBH and GLA Officers. The proposed scheme has therefore developed in response to the guidance received at a local and regional / strategic level and significant work has been undertaken by the design team to address the comments made by Officers. An explanation of how the scheme has evolved to take account of the consultation process is provided in Appendix 2.
- 3.23. Matters agreed and/or supported with / by GLA Officers during the pre-application process are outlined below:
- I. The principle of the residential redevelopment of the Estate with the aim to optimise potential and create new homes and high quality, affordable homes.
 - II. Re-provision of existing affordable floorspace in the form of replacement homes with private sale tenure (over and above the re-provision) to cross subsidise regeneration was accepted in principle and considered compliant with London Plan Policy H8 subject to the GLA's FVA review (as submitted).
 - III. The proposed (maximum) heights as well as indicative general block layouts and configurations were considered to be acceptable in principle, subject to further design detail and analysis (to include daylight, sunlight and overshadowing as well as micro-climate testing to accord with London Plan Policy D9).
 - IV. Provision of communal and private amenity space, in the form of private gardens, balconies, terraces and courtyards as well as communal podium gardens and a public open square alongside landscaping and public realm. The principle of the play strategy was accepted in achieving London Plan standards for doorstep play on-site with intergenerational provision also for older children play plus existing facilities available off-site.
- 3.24. GLA Officers also considered that the proposed scheme was subject to sufficient design scrutiny and feedback at the pre-application stage through proactive and supportive consultation and engagement with LBH LPA and GLA Design Officers (in the context of London Plan Policy D4).

3.25. As part of the pre-application meetings with GLA Officers, representatives from TFL were also present on the 27th July and the 1st September. TFL officers provided feedback on the proposed transport and car parking strategy. This included agreement on the scope and methodology of the Transport Assessment (“TA”) as prepared by the appointed transport consultant (Markides) as well as the proposed parking strategy in terms of allocation and distribution. TFL Officers recognised and accepted that the proposals seek to balance the maximum car parking standards as set out in the London Plan with the contractual obligation to provide replacement provision for existing residents through Estate regeneration.

Other Consultee Engagement

3.26. Other statutory and stakeholder engagement has included meetings and dialogue with the following:

- Heathrow Airport Limited
- National Air Traffic Services (NATS)
- Hayes Town Centre Residents Association
- Hillingdon Town Centre Partnership
- Secured by Design (to include a meeting on Tuesday 2nd November 2021)
- Canal and River Trust

3.27. Further detail of how both the technical assessments and Proposed Development itself have been shaped by this proactive approach to pre-application consultation and engagement are referenced as appropriate throughout the submitted HPA documents.

4. Proposed Development

- 4.1. This section of the Planning Statement describes the Proposed Development and its key design elements and principles. This should be read alongside the submitted Development Specification Statement which lists those elements that are “fixed” through the maximum parameters for the Outline Area and the tolerances associated with these as well as the details that remain indicative as part of the Illustrative Masterplan.
- 4.2. This planning application seeks a hybrid of part detailed, part outline planning permission for the redevelopment of the Site for residential purposes. This section provides a brief summary of the Proposed Development, including the scope of the Detailed First Phase and the Outline Area. Further details of the Proposed Development are included within the Design and Access Statement, Parameter Plans and Application Drawings which should be read in conjunction with this Section.
- 4.3. The formal Description of Development for the Proposed Development is:
- *“Development in outline (with all matters reserved) for residential floorspace (Class C3) to comprise: demolition of all existing buildings and structures; erection of new buildings; provision of a community centre (up to 140 sqm of Use Class F2(b) floorspace); new pedestrian and vehicular access; associated amenity space, open space, landscaping; car and cycle parking spaces; plant, refuse storage, servicing area and other works incidental to the proposed development; and*
 - *Detailed planning consent for Blocks A and B comprising 80 residential units (Class C3); new pedestrian and vehicular access; associated amenity space and landscaping; car and cycle parking; refuse storage, servicing area, and other associated infrastructure to include temporary highways and landscaping works”*

Demolition and Construction

- 4.4. In order to deliver high quality new homes across a mix of unit types, to include replacement and additional affordable housing, within a newly revitalised neighbourhood, all 260 existing homes, ancillary plant rooms, cores, walkways and parking areas across the existing Estate will need to be demolished.
- 4.5. The principle of demolition to enable the full redevelopment of the Site has been agreed with LBH LPA Officers during pre-application discussions. The existing buildings are of relatively poor quality and are not considered to have any architectural or heritage benefit. In addition, the declining nature of the existing homes is not in line with LBH’s aspirations for a high quality housing stock which meets current national design standards and building regulations. The demolition of the existing buildings therefore enables a comprehensive approach to the redevelopment of the Site but this will be phased in line with LBH’s decant and re-housing strategy to ensure minimal disruption for existing and returning residents.

- 4.6. As part of the detailed element of the hybrid application, full planning permission is sought for the demolition of existing buildings in the northernmost portion of the Site, known as Phase 1 and proposed to provide 80 new homes. A north to south sequenced approach is then proposed across the remaining Estate in four phases, which will see subsequent demolition of the remaining existing buildings to facilitate the delivery of development within Developments Zones 2-5, as set out on Parameter Plan 2. These later phases and Development Zones will be subject to future Reserved Matters Applications (“RMAs”) under the outline element of the Hybrid Planning Permission. The RMAs will not only provide details of the proposals for that phase / zone but also include details of the extent of demolition required to facilitate the Proposed Development.
- 4.7. Indicative Phasing and Demolition Plans have been prepared and submitted as part of this HPA. These are supplemented by an Illustrative Demolition and Phasing Strategy (as submitted) which sets out the sequential approach to the demolition of the existing Estate and construction of the Proposed Development (subject to the granting of planning permission) in line with LBH’s decant strategy. Whilst this remains indicative until finalised with input from the appointed Developer / Contractor it details the Applicant’s intent for scheme delivery. Initial proposed commencement of demolition works is expected to take place in Summer 2022, with initial construction works of the Detailed First Phase taking place from Autumn 2022, and completion of the regeneration of the whole Estate by Spring 2030 (subject to market conditions).
- 4.8. With relatively tight and focused delivery programme, it is recognised that development may need to occur across more than one phase at a time. Table 3 below therefore sets out the indicative construction and delivery programme across the five phases. Based on the Illustrative Masterplan, this is sequenced to ensure that the demolition of existing buildings and subsequent construction of new residential blocks, roads and open space/ public realm takes place in a timely, proper and orderly way that minimises disruption and conflict.

Table 3: Indicative Construction and Delivery Programme

Proposed Development Phase		Start date	Finish date
Construction of Phase 1 (Blocks A and B)		Autumn 2022	Summer 2024
Outline Area	Phase 2 (Blocks C and D)	Autumn 2024	Summer 2026
	Phase 3 (Blocks E and F)	Summer 2026	Spring 2028
	Phase 4 (Blocks G, H, I and J)	Spring 2028	Spring 2030
	Phase 5 (Mews Houses)	Spring 2028	Autumn 2029

Outline Area Proposal

- 4.9. The submitted Parameter Plans establish the key parameters and principles of the Outline Area of the Proposed Development. They establish the maximum parameters which have been assessed as part of this application to guide future masterplanning and the detailed design of future phases / zones. They provide a level of design

certainty about the quantum and quality that will be achieved. This is to ensure that, whilst providing sufficient flexibility to respond to future changes and constraints, future development will be delivered in a consistent manner that can come forward comprehensively alongside the Detailed First Phase.

Design Rationale and Layout

4.10. The submitted Design and Access Statement sets out a series of design principles which applies to the Illustrative Masterplan on an Estate-wide basis and in accordance with which the Detailed First Phase has been designed and the detail of the future phases of the Outline Area must come forward. These are as follows:

- **Scale and Massing:** This has been informed by Pollard Thomas Edwards' ("PTE"), as the project architect, analysis of the Site and its existing context. The strategy for the Proposed Development seeks to optimise footprint and height to create "liveable streets" and a street scale legible architecture. This means the buildings themselves through their articulation and material treatment will demonstrate a coherent relationship with the surrounding buildings, sky line and urban grain.
- **Connectivity:** The Proposed Development introduces new pedestrian and vehicular east-west access between Little Road, the Estate and the High Street, as well as north-south access between the proposed Community Square and the Grand Union Canal along the southern boundary of the Site. New residential streets between Crown Close and Austin Road will further enhance the permeability of the Site.
- **Green Infrastructure, Public Realm and Open Space:** The Proposed Development includes open space and public realm in the form of new green living streets, a Community Square, children's play areas and communal podium and courtyard gardens which are located within urban blocks to provide usable shared outdoor amenity space.
- **New Homes and a Sustainable Neighbourhood:** The provision of new (to include replacement) homes which are of the highest quality of design has been fundamental to the evolution of the Illustrative Masterplan. The homes will be bright, spacious, well laid out and well insulated from the outside environment. This will ensure a high level of internal comfort and cheaper running costs for residents.

Land Use Quantum

4.11. The Outline Area of the HPA will be delivered as a phased development across the Development Zones 2-5 (inclusive). Based on the Illustrative Masterplan this has the potential to comprise eight blocks (C – J) plus a series of Mews Houses (identified as Block K), with a combined maximum GIA of 28,725 square metres (comprising 28,585 square metres of Use Class C3 floorspace and up to 140 square metres of Use Class F2(b) floorspace). Table 4 below indicates how this maximum GIA is distributed by zone and block.

Table 4: Outline Area - Maximum Floor Area by Development Zone and Block (Indicative)

Development Zones	(Indicative) Block	Residential Unit No and Floor Area (GIA)*	Non-Residential (GIA)*
2	Block C	41 units 3,074 sqm	N/A
	Block D	40 units 2,738 sqm	N/A
3	Block E	45 units 3,106 sqm	N/A
	Block F	40 units 2,738 sqm	N/A
4	Block G	64 units 4,348 sqm	N/A
	Block H	44 units 2,560 sqm	N/A
	Block I	84 units 5,228 sqm	N/A
	Block J	50 units 3,437 sqm	140 sqm
5	Mews Houses	12 units 1,356 sqm	N/A
Total		420 units 28,585 sqm	140 sqm
Overall Total		28,725 sqm	

**Notes: All figures are in GIA format, and reflective of floorspace within each dwelling unit to represent those areas usually occupied by people i.e. habitable spaces. Therefore, plant rooms, car / cycle parking areas, ancillary stores, cores, stairwells, corridors and circulation routes, and spaces for on-site energy generation are excluded from these calculations. All floor area figures within the table are maximums, with the final total provision to not exceed these unless an amendment to this proposal is regularised in future.*

4.12. As noted in Table 4, whilst the non-residential floorspace is apportioned to Block J based on the Illustrative Masterplan and therefore within Development Zone 4, the maximum residential GIA is not. This will allow the final residential GIA for each block, based on the final unit mix in terms of size and tenure, to be established as part of future RMAs. This ensures flexibility within the defined extents of development as set by Parameter Plan 2.

Residential Floorspace

- 4.13. As illustrated on Parameter Plan 1, the residential floorspace proposed across the Outline Area will be contained within Development Zones 2-5. The total outline residential quantum would comprise a maximum of 28,585 square metres gross internal area (“GIA”) of residential unit floorspace which, with the current illustrative unit and tenure mix set out in Table 5 (both in unit numbers and in habitable rooms) equates to 420 homes. When read alongside the Detailed Area (which comprises 5,948 square metres GIA of residential unit floorspace) the total maximum residential unit provision across the Illustrative Masterplan will be 34,673 square metres. This compares to the 16,234 square metres of residential floorspace across the Estate as existing.
- 4.14. As above, whilst the intention with this HPA is to fix the 28,585 square metres of residential unit floorspace for the Outline Area as a maximum, the final dwelling mix for each residential block will only crystallise with future submissions of RMAs. In this instant therefore, the dwelling mix for the Outline Area is indicative and has been devised with consideration of existing resident needs, current LBH housing demand, as well as the overarching policy objective of optimising housing delivery.
- 4.15. The unit mix for the Outline Area comprises a “Maximum Parameter” approach for the remaining 420 units that could be delivered through the regeneration of the existing Estate. This has informed the Indicative Unit Range Mix (%) (Table 6 below) for the Estate as whole and has underpinned the Illustrative Masterplan which for the purposes of the supporting baseline and impact assessments, provides a basis for testing and demonstrating how the Maximum Parameters can be applied to deliver a comprehensive regeneration scheme. This provides the decision-maker with a level of certainty in demonstrating that a mix of units in terms of both size and tenure will come forward across the Outline Area. As set out at Table 5 below, this includes Social Rent Replacement homes as well as London Affordable Rent units forming part of the affordable tenure mix. This is alongside private market units which includes a proportion of private equity units as a diversification of the tenure offer. It also ensures that there is sufficient flexibility at future Reserved Matters stage for the amount of units per type and tenure to be determined as part of the detailed design process on a phase by phase / block by block basis.

Table 5: Illustrative housing size and tenure mix across Outline Area (Indicative)

	1 Bed	2 Bed	3 Bed	4 Bed	Total
Social Rent Replacement Homes	46 unit no 92 hr 2,320 sqm	61 unit no 183 hr 4,635 sqm	48 unit no 240 hr 4,430 sqm	4 unit no 24 hr 480 sqm	159 unit no 539 hr 11,865 sqm
London Affordable Rent	9 unit no 18 hr 450 sqm	24 unit no 72 hr 1,680 sqm	7 unit no 35 hr 602 sqm	N/A	40 unit no 125 hr 2,732 sqm
Private	100 unit no 200 hr 5,038sqm	105 unit no 315 hr 7,520 sqm	16 unit no 80 hr 1,430 sqm	N/A	221 unit no 595 hr 13,988 sqm

TOTAL	155 unit no 310 hr 7,808 sqm	190 unit no 570 hr 13,835 sqm	71 unit no 355 hr 6,462 sqm	4 unit no 24 hr 480 sqm	420 unit no 1,259 hr 28,585 sqm
TOTAL (%) (based on unit no)	37%	45%	17%	1%	100%

Table 6: Indicative Unit Range Mix (%) across the Illustrative Masterplan

	1 Bed	2 Bed	3 Bed	4 Bed
Indicative Unit Range (%)	16 - 36%	25 - 45%	15 - 17%	0 – 2 %

Non-Residential Uses

- 4.16. The Proposed Development will provide a maximum of up to 140 square metres of non-residential floorspace. This will take the form of a community centre (Use Class F2(b)) to serve local residents and provide replacement provision for the space currently located at the ground floor of Skeffington Court. It will provide an equivalent amount of floorspace of improved quality, as a minimum.

Table 7: Non Residential Uses Proposed

Existing Use (GIA)	Proposed Use (GIA)	Net Gain (GIA)
115 sqm	Up to 140 sqm	Up to 25 sqm

- 4.17. Parameter Plan 1 confirms the proposed location of the community centre within Development Zone 4 of the Outline Area of the scheme. The parameters fix the community centre within this location so that it provides an active frontage onto the proposed new Public Open Space in the form of the Community Square, as established through the hard and soft landscaping parameters of Parameter Plan 5. The extent of this frontage is shown indicatively on Parameter Plan 1. This is considered to form the heart of the Estate at the juncture of key north-south and east-west movement routes as established through Parameter Plan 4. The Illustrative Masterplan shows one way in which how this could all be effectively delivered.

Height and Massing

- 4.18. Parameter Plan 3 illustrates the maximum building heights proposed across the Outline Area. As set out in the submitted Design and Access Statement, the heights have been devised to ensure that the Site's potential can be optimised through the full redevelopment of the existing Estate whilst allowing for new built form to come forward in a way that is respectful of the surrounding context and townscape; particularly, from a neighbouring residential amenity perspective in terms of sunlight and daylight, outlook and privacy.
- 4.19. The illustrative proposals for the Outline Area comprise eight consolidated blocks (C – J) across the site which vary in height between 6 – 12 storeys, as well as smaller two storey Mews Houses fronting the eastern side of Crown Close (Block K). The tallest 12 storey element is positioned in the south western corner of the Site, where the built form is currently at its highest and where massing would be at the furthest point away from the existing residential properties along Little Road and Chalfont Road to the north east.
- 4.20. The Development Zones for Blocks C-D and E-F are identically sized in footprint and maximum height, all comprising of larger eight storey elements across the northern portion of the zones, stepping down to six storeys along Crown Close, and along the southern portion of the plot.
- 4.21. Parameter Plan 3 defines the maximum building heights as Above Ordinance Datum (AOD) for each Development Zone across the Outline Area. As is evident, this supports varying maximum heights across the Site according to the location within the Site and surrounding context (with consideration of both current and future) and has been informed by the existing site levels. This is also within the backdrop of the existing 15 storey tower block on Site which is equivalent to 12 storeys today based on current residential floor to ceiling height standards. The proposed maximum height parameters therefore continue to align with and do not exceed existing heights on the Site.
- 4.22. Table 8 below sets out the Maximum Proposed Heights per Development Zone and, in applying this to the Illustrative Masterplan, has established an Indicative Proposed Height on a block by block basis.
- 4.23. The maximum height parameters include an upper tolerance of + 1m to allow for roof plant which may for example exceed the ridge of the roof but are incidental elements when considered against the maximum height parameter. Development below or above the maximum height parameters will therefore be permitted where the proposals comprise an incidental feature, as stated above, and/or through detailed design development where the overall height maintains compliance within the stated level of tolerance and AOD having regard to the other Parameter Plans.

Table 8: Maximum and Indicative Proposed Heights for the Outline Area

Development Zone	Block	Communal Podium Garden (Indicative)	Maximum Height in AOD
2	Block C	35.15m	58.05m (up to 8 storeys)
	Block D	35.15m	51.90m (up to 6 storeys)
3	Block E	35.15m	58.05m (up to 8 storeys)
	Block F	35.15m	51.90m (up to 6 storeys)
4	Block G	N/A	61.5m (up to 9 storeys)
	Block H	35.45m	64.57m (up to 10 storeys)
	Block I	N/A	70.37m (up to 12 storeys)
	Block J	35.45m	58.30m (up to 8 storeys)
5	Mews Houses	N/A	37.39m (up to 2 storeys)

Open Space and Landscaping

4.24. The HPA includes open space and public realm in the form of new green living streets, a Community Square, children’s play areas and communal podium gardens/ courtyard. This is in addition to private gardens, terraces, courtyards and balconies. Amenity space across the Illustrative Masterplan can be categorised into three key types; public; communal (private), and private as set out in more detail below.

- *Public*

A total of 4,803 square metres of public open space, public realm and landscaping is proposed Estate-wide, as shown on the Illustrative Masterplan. This equates to 19% of the Site and comprises the Community Square, pedestrianised streets, the canal frontage and other landscaped / pedestrianised areas within the streetscene.

- *Communal*

A total of 1,950 square metres of communal (private) amenity space is proposed Estate-wide, as shown on the Illustrative Masterplan. This comprises podium gardens and dedicated ground floor courtyards configured between blocks as part of the Development Zones.

- *Private*

A total 5,320.5 square metres of private external amenity space is proposed, as shown on the Illustrative Masterplan. This will take the form of front and rear gardens as well as terraces for ground floor, podium level and second floor units as well as houses. Private balconies will be provided for units on upper floors of the residential blocks.

4.25. Parameter Plan 5 establishes the extent and distribution of, open space, public realm and amenity space in the context of the Development Zones. The Illustrative Masterplan shows how this could be delivered across the Estate, as summarised in Table 9 below and further detail is provided within the submitted Illustrative Landscape Strategy and submitted Design and Access Statement.

4.26. The delivery of open space, public realm and amenity space within the Outline Area will be guided by the parameters established through Parameter Plan 5 as well as the Illustrative Landscape Strategy and the design principles set out in the submitted Design and Access Statement. Table 10 below sets out the maximum quantum of each typology to be provided across the Outline Area to serve the needs of future and returning residents.

Table 9: External Open Space, Public Realm and Amenity Space across the Illustrative Masterplan (Indicative)

Typology	Proposed Provision (sqm)
Private Balconies, Terraces and Gardens	5,320.5 sqm
Communal (private) Amenity Space	1,950 sqm
Public Open Space	2,183 sqm
Public Realm and Landscaping	2,620 sqm
Total	12,073.5 sqm

Table 10: External Open Space, Public Realm and Amenity Space Proposed in the Outline Area (Maximum)

Amenity Type	Quantum	Form
Public Open Space	2,183 sqm	Community Square, pedestrianised streets and canal frontage
Public Realm and Landscaping	2,175 sqm	Greening within the streetscene to include to the perimeter of the blocks and pedestrianised zones.
Communal (Private) Space	1,672 sqm	Podium gardens and ground floor courtyards configured between the blocks.
Private Space	4,501 sqm	Ground floor front gardens, ground floor rear terraces and gardens, first and second floor terraces and balconies.

4.27. In terms of children’s playspace, indicative proposals for the Outline Area seek to deliver doorstep play within the communal podium gardens with informal “play-on-the way” provision distributed throughout the adjoining green streets. This is in addition to provision within the private residential amenity space in the form of balconies, terraces and courtyards. As set out in the Illustrative Landscape Strategy, a total of 2,111 square metres of children’s play space is proposed Estate-wide. This comprises 1,227 square metres of play for children aged 0-4 years; and, 884 square metres for children aged 5-11 years, as summarised in Table 11 below.

4.28. Indicative proposals for the Outline Area seek to deliver doorstep play within the communal podium gardens (acknowledging also that private gardens provide for doorstep play). “Local playable space” to serve the needs of 0-11 year olds as well as more informal intergenerational play space for all ages will be provided in the Estate-wide public realm and public open space to include the Community Square. The demand for older children’s (12+ years) provision will be met through existing provision surrounding the Site to include Botwell Green Sports and Leisure Centre to the north (within 400m) and Lake Farm County Park to the west (within 800m). This is in addition to provision within the private residential amenity space in the form of balconies, terraces and courtyards.

- 4.29. The structure, form and final size of each of these areas of play space will be determined through the detailed design development of the Outline Area as part of future RMAs.

Table 11: Play Space Quantum proposed across the Illustrative Masterplan (Indicative)

Play Space Type	London Plan (and LBH Policy DMHB 19) Policy Requirement	On-site Proposed Provision (sq.m.)
0-4 years	1,376 sqm	1,227 sqm
5-11 years	1,041 sqm	884 sqm (plus existing off-site facilities located within 400m as cited above)
12+ years	698 sqm	No on-site provision given adequate provision off-site within 400m and 800m (as cited above).
Total playable area	3,115 sqm	2,111 sqm (with off-site facilities provided and available for older children)

Table 12: Play Space Quantum proposed across the Outline Area (Indicative)

Play Space Type	London Plan (and LBH Policy DMHB 19) Policy Requirement (sqm)	Proposed Provision on the Site (sqm)
0-4 years	1,137 sqm	1,099 sqm
5-11 years	855 sqm	853 sqm (plus existing off-site facilities located within 400m as cited above)
12+ years	562 sqm	No on-site provision given adequate provision off-site within 400m and 800m (as cited above).
Total playable area	2,554 sqm	1,952 sqm (with off-site facilities provided and available for older children)

Transport and Access

- 4.30. Parameter Plan 4 defines the means of access into the Site as well as a framework of movement routes into and through the Estate. This applies across a range of travel modes and is subject to a primary, secondary and tertiary route hierarchy which seeks to prioritise movement by foot and bicycle alongside facilitating the necessary access for car parking permit holders, “Blue Badge” holders as well as deliveries and servicing. The submitted Design and Access Statement and Transport Assessment provide more information on the principles and rationale that inform these routes and will guide future development through forthcoming RMAs.

4.31. A total of 113 car parking spaces are proposed as part of the regeneration of the Estate. The majority of this will provide replacement car parking for returning residents to the Estate (110 no.) as well as provide replacement and new disabled bays for “Blue Badge” holders (15 no.). The potential for up to five car club spaces on the Estate has also been identified. This would come forward as part of the total parking provision, with one space provided as part of the Detailed First Phase and a further four to come forward within the Outline Area as demand dictates. On the basis of the Illustrative Masterplan and the Maximum Unit Parameter, 84 spaces are proposed on-site located at ground level beneath podium areas serving the residential blocks. An additional 29 spaces are to be provided on-street along access roads, as defined through Parameter Plan 4. Tables 13a, 13b and 13b below set out the maximum and indicative proposed car parking requirement on a Development Zone and block by block basis.

Table 13a: Maximum and Indicative Proposed On-site Car Parking by Development Zone

Development Zone	Block	Units	On-site	On-Site Ratio	On-Site Blue Badge
1	A, B	80	19	0.24	2
2	C, D	81	19	0.23	2
3	E, F	85	19	0.22	2
4	G, H, I, J	242	27	0.11	7
5	K	12	0	0.00	0
Cumulative		500	84	0.17	13

Table 13b: Maximum and Indicative Proposed On-street Car Parking by Development Zone

Development Zone	Block	Units	Crown Close	Austin Road	Internal Estate Roads	Silverdale Rd	On-Street Blue Badge	Car Club	On-street Total
1	A, B	80	0	0	1	0	1	1	3
2	C, D	81	0	0	5	0	1	1	7
3	E, F	85	0	0	1	0	0	3	4
4	G, H, I, J	242	0	0	0	0	0	0	0
5	K	12	0	15	0	0	0	0	15
Cumulative		500	0	15	7	TOTAL	2	5	29

Table 13c: Maximum and Indicative Total Car Parking Provision by Development Zone

Development Zone	Block	Units	Grand Total	Parking Ratio	Blue Badge Ratio
1	A, B	80	22	0.28	3.8%
2	C, D	81	26	0.32	3.70%
3	E, F	85	23	0.27	3.53%
4	G, H, I, J	242	27	0.11	2.9%
5	K	12	15	1.25	0.00%
Cumulative		500	113	0.23	3.0%

4.32. The provision of car parking to come forward within the Outline Area will be commensurate with the remaining capacity for the Estate following the delivery of the Detailed First Phase and on the basis of a ratio of 0.17 spaces per residential unit, Estate-wide, plus on-street parking. In accordance with the overarching outline car parking strategy for the Site, the exact number and location of these parking spaces will be determined through the detailed design development of the future RMAs on a phase by phase / block by block basis.

4.33. In terms of cycle parking, a total of total of 912 no. long-stay spaces will be provided for future and returning residents as well as 16 no. short-stay spaces for visitors. This in addition to 1 no. long-stay space and 2 no. short-stay spaces to serve the proposed Community Space. This is based on the Illustrative Masterplan and Maximum Unit Parameter and therefore represents the maximum (indicative) requirement on Development Zone and block by block basis, as set out in Table 14 below.

Table 14: Maximum and Indicative Cycle Parking Requirement by Block

Development Zone	Block	Long Stay Spaces (no.)
1	A	81
	B	68
2	C	79
	D	72
3	E	83
	F	72
4	G	120
	H	75
	I	148
	J	90
5	K	24
Total		912

Energy and Sustainability

- 4.34. The Proposed Development has been devised with due regard given to local and regional energy and sustainability expectations both during construction and operation as set out in the submitted Energy and Sustainability Statement. This includes measures that will be incorporated into the design, construction and operational management of the buildings across the Site with a view to minimising waste, optimising the potential for generation from renewable energy sources, and in securing low operational costs for returning and future residents over the long-term.
- 4.35. In this respect, the proposed energy strategy comprises a hybrid solution using a centralised Air Source Heat Pump (ASHP's) system located across each of the blocks, in addition to Photovoltaic (PV) panels to supply renewable electricity to the development. It is confirmed at this initial stage that this approach will deliver a minimum on-site reduction of at least 35 per cent beyond Building Regulations, and has the potential to achieve a 100% reduction in Regulated CO2 emissions, compared to Building Regulations, across the Outline Area and therefore be net zero-carbon entirely through on-site measures.
- 4.36. Further details are set out in Section 6 of this Statement as well as within the submitted Energy and Sustainability Statement. The Development Zones of the Outline Area as identified on Parameter Plan 2 have been designed to ensure they can accommodate appropriately sized plant rooms and dedicated internal space where required to support the delivery of the proposed energy strategy based on the Maximum Unit Parameter. The Illustrative Masterplan shows one way in which this could all be delivered on the Site.

Detailed First Phase

- 4.37. Within the Detailed First Phase, detailed planning permission is sought for Blocks A and B which comprise 80 residential units (Use Class C3); new pedestrian and vehicular access; associated amenity space and landscaping; car and cycle parking; refuse storage, servicing area, and other associated infrastructure to include temporary highways and landscaping works.
- 4.38. Whilst the Detailed First Phase sits outside the outline parameters, the detailed design has been developed in conjunction with these and the guiding principles to ensure that overall there is a comprehensive approach to the redevelopment of the Estate in line with LBH's vision. As such, and as set out below and within the Design and Access Statement, the localised design principles for the Detailed First Phase have been formed to ensure it is compatible with the wider Illustrative Masterplan and design principles.

- 4.39. Blocks A and B form the detailed part of this HPA to facilitate the upfront re-housing of returning Estate residents. As such, whilst compatible with the Outline Area, the Detailed First Phase has also been designed and assessed to ensure it can operate independently until the remainder of the regenerated Estate is delivered.
- 4.40. Temporary works will therefore be required for an interim period within the Detailed First Phase to serve the returning and new residents before the subsequent phases come forward across the Estate. These temporary works will facilitate resident access by car, bicycle and foot both around and into the new residential blocks; provide temporary parking to serve the ground floor units as well as displaced provision along the retained Austin Road during demolition and construction; accommodate delivery and servicing requirements; and enable initial greening and softening through landscaping, play and public realm features. Details of these temporary works form part of the detailed element of the HPA and are provided for approval, as shown on the submitted Temporary & S278 Works Key Plan (ref. HTC-TEP-P1-00-DR-L-90103) and within the submitted Transport Assessment and Landscape Strategy.

Layout

- 4.41. Blocks A and B are to be located within a parcel of land on the northern boundary of the Site fronting Pump Lane. Whilst they form two distinct residential blocks which are served by separate accesses and cores, they are connected at first floor level by a podium which, provides communal (private) amenity space for residents. Below on the ground floor, car and cycle parking is provided.
- 4.42. Duplex family homes are proposed at ground and first floor level of both blocks, creating a domestic scale to the street. On the upper floors of Blocks A and B, seven and six residential units in the form of apartments, respectively, will be arranged around a single circulation core. The internal floor layouts have been designed to maximise the aspect of living spaces over the communal (private) amenity podium garden within the centre of the two blocks.

Land Use Quantum

- 4.43. The Detailed First Phase of the HPA seeks permission for 5,948 square metres GIA within Blocks A and B at the northern end of the Estate. There is no non-residential floorspace proposed within the Detailed First Phase, only residential. The distribution of the proposed floorspace per block is set out in Table 15 below.

Table 15: Detailed First Phase - Floor Area by Block

Block	Residential Floorspace (GIA)*
Block A	3,098 sqm
Block B	2,850 sqm
Total	5,948 sqm

**Notes: All figures are in GIA format, and reflective of floorspace within each dwelling unit to represent those areas usually occupied by people i.e. habitable spaces. Therefore, plant rooms, car / cycle parking areas, ancillary stores, cores, stairwells, corridors and circulation routes, and spaces for on-site energy generation are excluded from these calculations. All floor area figures within the table are maximums, with the final total provision to not exceed these unless an amendment to this proposal is regularised in future.*

Residential

- 4.44. The Detailed First Phase will deliver 80 new homes as the fixed provision to come forward across Blocks A and B and to include replacement homes for returning Estate residents. This forms part of the 500 unit total for the scheme and fully complies with the cumulative unit mix.
- 4.45. Block A contains 44 dwellings over eight and six storeys and Block B contains 36 dwellings over six storeys. The dwelling, tenure and habitable rooms of the combined mix across the Detailed First Phase is set out in Table 16.

Table 16: Housing size and tenure mix across Detailed First Phase

	1 Bed	2 Bed	3 Bed	4 Bed	Total
Social Rent Replacement Homes	8 unit no 16 hr 423 sqm	19 unit no 57 hr 1,515 sqm	9 unit no 45 hr 850 sqm	4 unit no 24 hr 478 sqm	40 unit no 142 hr 3,266 sqm
London Affordable Rent	N/A	N/A	N/A	N/A	N/A
Private	15 unit no 30 hr 751 sqm	18 unit no 54 hr 1,322 sqm	7 unit no 35 hr 609 sqm	N/A	40 unit no 119 hr 2,682 sqm
TOTAL	23 unit no 46 hr 1,174 sqm	37 unit no 111 hr 2,836 sqm	16 unit no 80 hr 1,460 sqm	4 unit no 24 hr 478 sqm	80 unit no 261 hr 5,948 sqm
TOTAL (%) (based on unit no)	29%	46%	20%	5%	100%

4.46. In terms of tenure, as illustrated above, Blocks A and B will comprise a total of 261 habitable rooms. Of this, 142 habitable rooms will be affordable, which equates to a 54% split of affordable and 46% private. As detailed below, this will provide a total of 3,266 square metres of affordable residential floorspace across the Detailed First Phase.

Table 17: Affordable Provision in Detailed First Phase

Blocks A & B	Unit No.	Habitable Rooms	Floorspace (sqm)
Social Rent	40	142	3,266
London Affordable Rent	N/A	N/A	N/A
Total	40	142	3,266

Height and Massing

4.47. As set out in Table 18, Blocks A and B each contain a podium level garden, and two separate maximum heights reflective of the stepping down from eight storeys at the north to six storeys to the east and south. Where Block B meets Block A at the north western corner of the Detailed First Phase, Block B steps down to two storeys, creating a break within this frontage. The respective heights of Blocks A and B are thus set out below in Table 18.

Table 18: Proposed Block Heights in AOD for Detailed First Phase

Development Zone	Block	Communal Podium Garden (Indicative)	Maximum Height in AOD
1	Block A	35.15m	58.05m (up to 8 storeys)
	Block B	35.15m	51.90m (up to 6 storeys)

Materiality and Design

4.48. In order to provide visual interest to Blocks A and B, consideration has been given to the articulation of the blocks and the colour and material palette. This seeks to optimise Block A's frontage onto Pump Lane and through a double height entrance space, with an exposed open corner, will provide a clear arrival point at the entrance of the Site. The detailing along the elevations then seeks to break up the massing and reinforce built form at a human scale as it connects to Block B.

- 4.49. As set out in more detail in the Design and Access Statement, the edge conditions and material treatment of the facades of Blocks A and B have been categorised into five different detailed designs. Each displays a different yet complimentary relationship and architectural language with the adjoining street type as well as the context and character of the area.
- 4.50. For the eight storey element of Block A, a material palette comprising a pale brick with mushroom coloured window frames and metal work is proposed. For the lower lying elements of Blocks A and B a warm multi-stock brick is proposed to provide a tonal contrast with the treatment and appearance of Block A fronting Pump Lane. Both will feature green glazed brick which provides a tonal reference to the historic and industrial context along Silverdale Road, to include the Grade II Listed Benlow Works. These vernaculars will provide visual variety across the Estate whilst also complimenting and responding to the varied townscape beyond the Site itself. The sensitive approach to design has been similarly carried through internally. The cores and corridors have been configured for ease of access and escape in case of emergencies and the residential units are spacious, well laid out, contain sufficient storage provision, and are comfortable for residents.

Open Space and Landscaping

- 4.51. All residential units within Blocks A and B will be provided with private external amenity space in the form of either a terrace or garden for units on the ground floor; courtyard / terrace for those adjoining the communal podium garden at first floor; and, balconies plus roof terraces for those units above. The ground floor terraces and gardens will be sufficiently set back from the adjacent street through landscaping to provide defensible space and sufficient privacy for residents.
- 4.52. The Detailed First Phase will provide 2,218 square metres of external amenity space and public realm / landscaping. This comprises a range of typologies as set out in Table 19 below at the specified quantum to serve the needs of new and returning residents within this first phase. The detailed layouts for each of these spaces are shown on the Illustrative Landscape Plan (Phase 1) (Permanent Works) (ref. HTC-TEP-P1-ZZ-DR-L-90104) with their design rationales and specifications detailed further in the submitted Landscape Strategy.

Table 19: External Open Space, Public Realm and Amenity Space Proposed in the Detailed First Phase

Amenity Type	Quantum	Form
Public Realm and Landscaping	1,120 sqm	Greening within the streetscene to include to the perimeter of the blocks and temporary landscaping as part of the temporary access arrangements
Communal (Private) Amenity Space	278 sqm	Podium garden situated between Blocks A and B.

Private Space	820 sqm	Ground floor front gardens, ground floor rear terraces, first and second floor terraces and balconies.
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- 4.53. Of the total 80 units proposed, all will have access to their own respective provision of private outdoor amenity. In terms of outdoor communal amenity space, the blocks will have an associated communal podium garden which will serve residents only and be landscaped and equipped with a combined total of 128 square metres of playspace (to include private gardens) for children aged 0-4 years. This will be permanently delivered to meet the needs of the 0-4 year olds anticipated to be generated as a result of the 80 units to come forward within Blocks A and B. This will be supplemented temporarily by up to 248 square metres of play space for 0-11 year olds as part of the temporary works within the Detailed First Phase for use until additional play space is provided as part of the later phases of the development.
- 4.54. As set out in more detail in the submitted Design and Access Statement and Landscape Strategy (which includes detailed play strategy), the communal amenity spaces have been designed for recreational activity, seating and resident gathering, the potential for community growing area as well as play.

Transport and Access

- 4.55. For the Detailed First Phase, all pedestrian access into Blocks A and B will be gained through the secure entrances at street level or internally via the podium parking areas. Landscaped pavements, both permanent and temporary, will be provided off Pump Lane, Austin Road and Crown Close to facilitate this and connect back into the existing Estate.
- 4.56. Car parking for the Detailed First Phase is proposed beneath the podiums of Blocks A and B. This will provide 19 no. car parking spaces, to include two disabled bays for "Blue Badge" holders. In addition, 3 no. car parking spaces will be provided on-street along the internal east-west Estate road to the south of Block B, to include 1 no. disabled bay for "Blue Badge" holders and 1 no. car club space.
- 4.57. For cycle parking, a total of 149 no. long-stay spaces will be provided for future and returning residents as well as 4 no. short-stay spaces for visitors. This is based on the fixed Unit Mix for the Detailed First Phase as set out at Table 16.

Table 20a: Proposed On-site Car Parking for Detailed First Phase

Development Zone	Block	Units	On-site	On-Site Ratio	On-Site Blue Badge
1	A, B	80	19	0.24	2

Table 20b: Proposed On-street Car Parking for Detailed First Phase

Development Zone	Block	Units	Crown Close	Austin Road	Internal Estate Roads	Silverdale Road	Blue Badge	Car Club	Total
1	A, B	80	0	0	1	0	1	1	3

Table 20c: Proposed Total Car Parking Provision for Detailed First Phase

Development Zone	Block	Units	Grand Total	Parking Ratio	Blue Badge Ratio
1	A, B	80	22	0.28	3.8%

- 4.58. Resident long-stay cycle parking will be provided in secure stores located at the ground floor of residential Blocks A and B with short-stay provision for visitors distributed within the public realm.

Energy and Sustainability

- 4.59. Blocks A and B have been designed to incorporate measures which align with the energy and sustainability strategy for the Proposed Development as a whole. The details of these measures are included in more detail in the submitted Energy and Sustainability Statement and considered further in Section 6 of this Statement but can be summarised as follows:

- High levels of insulation, airtightness, energy efficient lighting plus high efficiency / low SFP heat recovery mechanical ventilation;
- Centralised heat pump systems for domestic hot water and space heating – each optimised to the operating temperatures of the system it serves; and
- An extensive rooftop Photovoltaic (PV) array.

4.60. The implementation of the above measures will enable of target reduction in regulation CO2 emissions of 102% compared to Building Regulations which means the Detailed First Phase can achieve net zero-carbon entirely on-site.

5. Planning Policy Context

5.1. The proposals for the Site have taken account of relevant national, regional and local planning policy and guidance. This section of the Planning Statement sets out a brief summary of the relevant planning policy documents, whilst the following section demonstrates compliance with the policies contained within.

Development Plan

5.2. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that development proposals be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.3. The adopted Development Plan for LBH, in so far as is relevant to the proposals, consists of:

- The London Plan (“LP”) (March 2021)
- The Local Plan: Part 1 (“LPP1”) - Strategic Policies (November 2012)
- The Local Plan: Part 2 (“LPP2”) - Development Management Policies (January 2020)
- The Local Plan: Part 2 (“LPP2”) - Site Allocations and Designations (January 2020)

5.4. Other material considerations include:

- National Planning Policy Framework (NPPF) (July 2021)
- National Planning Practice Guidance (PPG)
- LBH’s SPD “Hillingdon Design and Accessibility Statement” (HDAS) (April 2006)
- LBH’s SPD “Planning Obligations” (July 2014)

National Planning Policy

National Planning Policy Framework (July 2021)

5.5. The NPPF was most recently updated in July 2021. The NPPF sets out the Government’s planning policies for England and how these should be applied.

5.6. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11). In order

to achieve sustainable development, the planning system is said to have three overarching objectives which are interdependent and need to be pursued in mutually supportive ways, these are:

- a) an economic objective;
- b) a social objective; and
- c) an environmental objective.

5.7. Section 5 relates to the delivery of a sufficient supply of homes and states that housing applications should be considered in the context of the presumption in favour of sustainable development. In order to “*significantly boost the supply of housing*”, Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing target.

Planning Practice Guidance

5.8. In March 2014 the Government published the PPG to provide more detailed guidance for planners and communities. The PPG has been updated on various occasions since its inception, the most recent update being in June 2021. The PPG should be read alongside the NPPF.

Regional Policy

London Plan (March 2021)

5.9. The LP, published March 2021, provides the spatial development strategy for London which deals with matters of strategic importance to Greater London. The LP 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.

GLA Supplementary Planning Guidance

5.10. The Mayor of London has also produced a number of Supplementary Planning Guidance ('SPG') documents that have been considered in preparing the development proposals, where relevant. These are listed below.

- Affordable Housing & Viability (August 2017)
- Housing (March 2016)
- Good Practice Guide to Estate Regeneration (February 2018)
- Social Infrastructure (May 2015)
- Accessible London: Achieving an Inclusive Environment (October 2014)
- The control of dust and emissions during construction and demolition (July 2014)
- Character and Context (June 2014)
- Play and Informal Recreation (September 2012)
- All London Green Grid (March 2012)
- Planning for Equality and Diversity in London (October 2007)
- Be Seen' Energy Monitoring Guidance (October 2020)
- Draft Good Quality Homes for all Londoners (October 2020)
- Draft Circular Economy Statements (October 2020)
- Draft Whole-life Carbon Assessments (October 2020)
- Draft Public London Charter (October 2020)
- Other guidance: Energy Planning Guidance (updated April 2020) and Contamination Land Process note (June 2020)

- Pre-Consultation Draft London Plan guidance on Fire Safety and Urban Greening Factor

5.11. The Mayor of London CIL2 ('MCIL2') Charging Schedule (2019) is also applicable to the Proposed Development.

Local Planning Policy

Hillingdon Local Plan (2012 and 2020)

5.12. The Local Plan is the foundation for how development is and will be controlled within Hillingdon up to 2026.

5.13. The two sections of the Local Plan form LBH LPA's future development strategy for the borough. Together they set out a framework and detailed policies to guide planning decisions and it is the starting point for considering whether planning applications should be approved.

5.14. LPP1 sets out the overall level and broad locations of growth for the plan period. It comprises a spatial vision and strategy, strategic objectives, core policies and a monitoring and implementation framework with clear objectives for achieving delivery. It was adopted in 2012 and the enclosed policies are supported by more detailed policies and allocations set out in the LPP2.

5.15. LPP2 comprises Development Management Policies, Site Allocations and Designations and the Policies Map. LPP2 Development Management Policies and Site Allocations and Designations were adopted as part of the borough's development plan at Full Council on 16 January 2020. This replaces the LPP2 Saved UDP Policies (2012).

LBH Supplementary Planning Documents

5.16. LBH has also adopted Supplementary Planning Documents ('SPDs') which have been taken into consideration in the development proposals. These are listed below:

- LBH's SPD "Hillingdon Design and Accessibility Statement" (HDAS) (April 2006)
- LBH's SPD "Planning Obligations" (July 2014)

Site Designations and Allocations

5.17. As defined by the Development Plan, the Site is located within the following designations:

- The wider GLA's Heathrow/Elizabeth Line West Growth Corridor;
- Hayes Opportunity Area;
- Hayes Town Centre; and
- Hayes Housing Zone (HHZ).

5.18. As noted previously, the Site is also allocated for residential redevelopment purposes under a wider (adopted) allocation SA23 (Silverdale Road/Western View) of LBH's LPP2 (January 2020). SA23 is broken down into three sub-areas (Sites A, B and C) and the existing Estate falls within Site C being identified for delivery of some 400 units (gross) as part of a wider circa 640 unit delivery across the sub-areas as a whole.

5.19. The focus of SA23 is the Council's desire to support catalytic regeneration of the area with the focus to significantly improve existing housing stock within the Estate. It is considered that there is a unique opportunity to optimise density through the current proposals beyond that identified within the allocation for the Site (which is discussed in some detail in Section 6).

5.20. More specifically the allocation requires any development scheme at Site C to pay particular regard to the following criteria, as set out under Policy SA23:

- *"The provision of 400 residential units (gross) in accordance with the London Plan density range for urban locations, to reflect the Council's latest evidence on housing need.*
- *The proposals should include improved connectivity between Silverdale Road, Western View, Austin Road and Hayes Town Centre.*
- *The provision of appropriate new public open space.*
- *Proposals should include high quality design to fully integrate with the Grand Union Canal, ensure*

canal side access and promote canal-side activity to maximise recreational potential.

- *Development should contribute to the enhancement of the Strategic Canal and River Corridors, in accordance with relevant policies on the Blue Ribbon Network.”*

5.21. Within Hayes Town Centre, high densities are actively promoted at London Plan and local plan level whilst also being situated within the designated HHZ (where the HHZ is expected to deliver a significant proportion of the Council's housing requirement).

5.22. The Estate's renewal will actively assist in contributing towards the borough's pressing affordable and general housing needs and demands in the short, medium and longer term.

6. Conformity of the Proposed Development with Planning Policy

- 6.1. This section demonstrates the conformity of the Proposed Development with the relevant planning policy and designations as contained within the Development Plan for the Site and having regard to other material planning considerations.
- 6.2. The following planning matters represent the key considerations in the determination of the HPA and are addressed in turn within this section:
- Principle of Development
 - Residential Uses (Quantum and Density)
 - Affordable Housing
 - Dwelling Mix
 - Housing Design Standards and Quality of Accommodation
 - Housing Accessibility
 - Non-Residential Uses
 - Design Approach
 - Heritage, Townscape and Visual
 - Archaeology
 - Transport
 - Energy and Sustainability
 - Flood Risk and Drainage
 - Air Quality
 - Noise
 - Fire Strategy

Principle of Development

- 6.3. The principle of residential use on the Site is established by virtue of its existing use and its site specific allocation for residentially-led redevelopment under SA23 of LPP2. The principle of the Site's redevelopment for residential use has also been accepted by LBH LPA and GLA Officers as part of the extensive pre-application consultation and engagement process.
- 6.4. NPPF 94 highlights the importance of considering the "social, economic and environmental benefits of estate regeneration" in planning policies and decision making. It goes on to state that "*local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.*"
- 6.5. The LP similarly recognises the important role of the redevelopment and intensification of existing housing estates. The Site is located within Hayes Opportunity Area which is identified in strategic terms to have a significant capacity for development. LP Policy SD1 is clear that in contributing to the regeneration objectives of Opportunity Areas, the delivery of affordable housing and creation of mixed and inclusive communities should be maximised.
- 6.6. LP Policy H8, in particular, supports the demolition and replacement of existing homes, to include through estate redevelopment proposals, provided it results in a level of housing "...at existing or higher densities with at least the equivalent level of overall floorspace" (Part A). Supporting paragraph 4.8.1 promotes intensification of existing housing estates as a key future provider of new homes and affordable homes, in support of LP Policy H8. Housing optimisation at the Estate is therefore not disputed, as a principle.
- 6.7. Where such proposals comprise affordable housing, there is an expectation under LP Policy H8 that all alternative development intervention options (such as refurbishment, infilling and partial redevelopment) must be explored first, and before demolition and replacement housing are pursued (Part C). Policy H8 goes onto state that the demolition of affordable housing will "*...not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace*" and it must facilitate the right of return for existing residents (Part D). Such proposals should also seek to provide an uplift in affordable housing floorspace over and above replacement, subject to viability (Part E). These affordable housing matters demonstrating how the application proposals comply with LP Policy H8 (parts C, D and E, in particular) are set out later within this section.

- 6.8. Section 3 of this Planning Statement confirms that full and due consideration has been given to alternative development intervention options in support of the case for regeneration and outlines the process (to include extensive and on-going consultation and engagement with existing residents) that has been undertaken before proceeding with proposals for the full redevelopment of the existing Estate, as part of this HPA. The details and process of this extensive resident consultation is set out in the wider SCI as submitted.
- 6.9. The regeneration proposals are considered to create very significant economic, social and environmental benefits, all of which are considered to justify the proposed level of intervention. Such benefits are identified in Section 8 and detailed further within the submitted Economic Impact Assessment (incorporating a Social Value Assessment) which forms Appendix 3 of this Planning Statement. This conforms with Part C of Policy H8 and the further guidance contained within the Mayor's Good Practice Guide to Estate Regeneration (February 2018).
- 6.10. The specific requirements of Parts D and E of LP Policy H8 are considered in further detail in the following sub-sections in quantifying the density and affordable housing offer of the Proposed Development but are addressed in summary, from a point of principle, below.
- 6.11. At a local level, the Site is located within Hayes Town Centre and HHZ where higher densities are actively supported and a significant proportion of the borough's housing requirement is expected to be delivered.
- 6.12. SA23 identifies the Site, as Sub-Area C, as having an indicative capacity to deliver 400 new homes. This represents a net gain in homes by 140 units when compared to the existing 260 units on the Estate and forms part of the wider, circa 640 unit total identified indicatively across the three sub-areas of SA23. It confirms that the intensification of the existing use of the Site through redevelopment is considered acceptable in principle. This conforms with the general thrust of national and LP policy, which promotes the optimisation of previously developed, under-utilised land to deliver new homes in order to contribute towards identified housing needs, especially where the site is located in a highly sustainable town centre location.

- 6.13. Policy H1 of LPP1 identifies a need to deliver over 4,250 new homes between 2011 and 2021 (or 425 dwellings / year) in order to meet the borough's housing target. This policy is however now out of date having been prepared against the backdrop of a previous LP (as amended in 2011). The recently adopted LP (March 2021) states that the borough should aim to deliver a minimum of 10,830 new dwellings over the next 10 years (or 1,083 dwellings / year) and this target is only expected to increase in the early review of the LP.
- 6.14. The LP housing target combined with the introduction of Standard Method 1.1 (with the Urban Centres Uplift applied), which identifies a need for 3,651 homes per annum within the borough, is significantly more than 425 homes per annum currently planned for through LLP1. There is therefore significant pressure on LBH LPA to deliver new homes and existing estate regeneration proposals such as the Estate offer that unique opportunity.
- 6.15. As evident from the relevant designations and SA23, the Site is located in a highly sustainable location which is identified to have capacity for regeneration and a level of growth at densities much greater than existing. The Proposed Development demonstrates that the redevelopment of the Site has the potential to deliver 500 new homes (51.7% of which will be affordable homes provision based on floorspace) within a high quality residential environment. This would significantly contribute to the borough's identified housing need whilst also satisfying Parts A, D and E of LP Policy H8. The proposed quantum of residential units, whilst greater than the indicative capacity identified under SA23, has been determined as appropriate through the various technical impact assessments that have been prepared to inform the design development of the Illustrative Masterplan and outline parameters submitted in support of the HPA (as explored further in the following sub sections).
- 6.16. In light of the above, the Site's full redevelopment will make a significant contribution to the housing needs of the borough (particularly a significant quantum of affordable homes) on a highly sustainable brownfield site within Hayes Town Centre. The principle of redevelopment to provide replacement and additional housing is therefore considered to be acceptable in the context of NPPF 94, LP Policies SD1 and H8 and LPP1 Policy H1.

Residential Uses (Quantum and Density)

- 6.17. NPPF 60 states that “*to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed...*”. It is therefore expected that within planning policies and decision-making, development that makes the efficient use of land is actively supported. This is taking into account a set of criteria to include identified need for different types of housing; market conditions and viability; infrastructure and services; the surrounding character and setting; and, securing well-designed, attractive places (NPPF 124). NPPF 125 is clear that building at low densities should be avoided and encourages “*...the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate.*”
- 6.18. This approach to density in support of land optimisation is also evident through the adopted LP (2021) which removes the former LP Density Matrix along with any references to the application of density ranges. LP Policy D3 instead supports the implementation of LP Policy GG2 which seeks to ensure development is making the best use of land and promotes a design-led approach to site optimisation which majors on achieving contextually sensitive, high quality design in highly accessible locations. LP Policy D2 then sets out how the density of development proposals should consider the provision of future planned levels of infrastructure and be proportionate to the site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services. The LP emphasises therefore the real importance of making best use of London’s land by using brownfield sites and intensifying the density and use of existing places, to include important estates such as these proposals.
- 6.19. At a local level, LPP2 Policy DMHB17 states that all new development should take account of the Residential Density Matrix contained within Table 5.3 of LPP2 which reflects the former Density Matrix of the former LP (2016) and therefore pre-dates the above. Supporting paragraph 5.66 states that LBH LPA will apply the density standards “*...in a flexible manner, according to local circumstances...*” and it is recognised that there are certain areas such as town centres and Opportunity Areas where high density development is more suited.

6.20. The Site is situated within the Hayes Opportunity Area which is identified in Table 2.1 of the LP to have an indicative capacity for 4,000 new homes. The Site is also located within Hayes Town Centre and Hayes Housing Zone, within which the circumstances for high density development as set out above, entirely apply.

6.21. The Estate achieves a PTAL of between 4 and 5, with the higher rating achieved toward the Site's southern edge, based on the appointed transport consultant's manual PTAL calculation (noting TFL's 2031 forecast of entirely PTAL 4-5 for the Estate as a whole). A site with a PTAL rating 5 is considered to have very good public transport accessibility and as such according to the LP, high density development is considered appropriate in these central, town centre locations.

Illustrative Masterplan

6.22. In considering the Proposed Development, it is important that density is assessed across the Illustrative Masterplan as a whole. This is inclusive of both the Detailed First Phase comprising 80 units and the Outline Area based on the established parameters, comprising a maximum residential floorspace of 28,585 square metres (GIA) which equates to 420 units. Across the Illustrative Masterplan, a total of 500 new homes would replace the existing 260 units on the Estate, resulting in an uplift of 240 units. In density terms, this results in 200 units / hectare.

6.23. For context and in accordance with LPP2 Policy DMHB17, the Proposed Development therefore falls within the indicative range of the former LP Density Matrix which seeks between 70-260 units / hectare (200- 700 habitable rooms / hectare) on the basis of an "urban" location with a PTAL rating of 4-6. Whilst the proposed density is higher than the density guideline set out under SA23 (based on 400 units and a slightly smaller site area of 2.3 hectares) at 174 units / hectare, it aligns with the thrust of national, regional and local planning policy and the support for additional net capacity identified under SA23 which encourages "a significant uplift in the average density of residential development" (NPPF 125a) in highly sustainable town centre locations such as the Site. The following sub sections demonstrate further that this level of optimisation is considered appropriate when considering site-specific characteristics and within a context where regeneration and change is being actively promoted through SA23, with the Estate representing a prime catalyst for such.

- 6.24. The development at Highpoint Village which sits to the south of the existing Estate, beyond the canal, was approved with a density of 191 units / hectare; the Silverdale Industrial Estate to the east was approved at 179 units / hectare density and the Chailey Industrial Estate at 184 units / hectare density. These provide a new context for considering optimisation of housing delivery at the Site which represents a level of density only marginally above these neighbouring sites and still within the indicative density range of the former LP Density Matrix. This is also on the basis of the imminent Crossrail completion.
- 6.25. The submitted Design and Access Statement and Heritage, Townscape and Visual Impact Assessment (“HTVIA”) provides further detail on how the Illustrative Masterplan has been designed to respond to wider considerations, such as scale. The submitted technical impact assessments demonstrate the capacity of the Site’s physical, environmental and social infrastructure, to include new and enhanced provision coming forward as part of the Proposed Development, in supporting the densities proposed.
- 6.26. The proposed density across the Illustrative Masterplan is therefore considered entirely appropriate for this highly accessible town centre location and will be significant in delivering much needed replacement and new affordable (and private sale) homes. As set out at paragraphs 6.14 and 6.15 above, LBH LPA are under significant pressure to deliver new homes to meet both borough and London-wide needs. High density development on previously developed land, to include existing estates, is essential to achieving this where considered appropriate within its context and commensurate with development impact, mitigation and enhancement. This estate regeneration represents a significant housing contributor in that context. The Proposed Development is therefore considered to accord with NPPF 60, 124 and 125; LP Policies GG2, D2 and D3; and LPP2 Policy DMHB17.

Detailed First Phase

- 6.27. In terms of the Detailed First Phase only, it comprises Blocks A and B, situated at the northern end of the Site, fronting Pump Lane which is a primary movement corridor that extends east from the town centre and subject to the Site’s very good PTAL rating of between 4 and 5. Block A has a maximum height of 8 storeys where it fronts Pump Lane, it then steps down to 6 and 2 storeys as it extends south into the site and meets Block B which similarly sits at 6 and 2 storeys to the south and west respectively. Together, Blocks A and B will provide 80 homes, 5,948 square metres of residential floorspace and 261 habitable rooms.

- 6.28. The site area of the Detailed First Phase, as defined by the dotted red line, measures 0.46 hectare. This therefore results in a density of 174 units / hectare. For context and in accordance with LPP2 Policy DMHB17, the Detailed First Phase element of the Proposed Development falls within the indicative range of the former LP Density Matrix which seeks between 70-260 units / hectare (200- 700 habitable rooms / hectare) on the basis of an “urban” location with a PTAL rating of 4-6. It also aligns with the densities established on neighbouring sites as discussed above.
- 6.29. The proposals for the Detailed First Phase are therefore wholly in-keeping with the density rationale for the Illustrative Masterplan and the Site’s highly sustainable, town centre location. Through early delivery, it will set the context for the regeneration of the wider Estate and future RMAs in accordance with the objectives of national, regional and local planning policy.

Affordable Housing

- 6.30. The NPPF focuses on the delivery of affordable housing through major developments. The national guidelines draw attention to key factors for delivery. For large developments such as the Proposed Development, the need to deliver levels and types of affordable housing in line with local plans is noted.
- 6.31. LP Policy H4 sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable and advises specific measures to achieve this which for major developments should be in accordance with the threshold approach set out under LP Policy H5. For estate regeneration schemes specifically, such as the Proposed Development subject to this HPA, Footnote 52 is clear that separate affordable housing requirements as set out under LP Policy H8 are applicable.
- 6.32. LP Policy H8 (Part A) states that: the “*loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace*”. It resists the demolition of affordable housing unless it is replaced by an equivalent amount of affordable housing floorspace, and affordable housing floorspace is re-provided on a “like-for-like” basis (ie. Social Rent housing replaced with Social Rent housing where facilitating the right to return) and integrated into the development to ensure mixed and inclusive communities (Part D). If not facilitating a right to return, it may be provided as either Social Rent or London Affordable Rent housing. This re-provision is primarily based on affordable floorspace (with unit numbers and habitable rooms also a consideration) to ensure no overall net loss.

- 6.33. Policy LP H8 goes on to state that all development proposals that include the demolition and replacement of affordable housing should follow the Viability Tested Route and seek to provide an uplift, where viable, in addition to re-provision (Part E).
- 6.34. With regards to tenure split, LP Policy H6 and the Mayor's Affordable Housing SPG requires: a minimum 30% as London Affordable Rent or Social Rent homes, a minimum of 30% as intermediate products and the remaining 40% to be determined by the local planning authority based on identified need.
- 6.35. At a local level, LLP1 Policy H2 expects housing provision "*...to include a range of housing to meet the needs of all types of households...*" and states that "*...the Council will seek to maximise the delivery of affordable housing from all sites...*". In accordance with LP Policy H2, LPP2 Policy DMH7 outlines that "*subject to viability and if appropriate in all circumstances, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with the tenure split 70% Social/Affordable Rent and 30% Intermediate.*"

Illustrative Masterplan

- 6.36. In assessing the affordable housing provision of the Proposed Development against the LP and local plan policy, it is important to consider the offer as a whole and on the basis of the Illustrative Masterplan which comprises the Detailed First Phase plus Outline Area. This is to ensure and demonstrate that through the full redevelopment of the Estate, to include the later phases currently subject to outline parameters only, an appropriate level of affordable housing provision can be secured and ultimately be delivered.
- 6.37. The Illustrative Masterplan comprises a maximum (GIA) residential floorspace of 34,533 square metres which equates to 500 residential units and 1,520 habitable rooms based on the indicative unit mix. Of this, 17,863 square metres is affordable housing floorspace, equating to 239 units and 806 habitable rooms. This accounts for replacement affordable housing provision, in the form of Social Rent units plus new additional affordable units in the form of London Affordable Rent, resulting in an overall affordable housing provision of 51.7 % Estate-wide based on floorspace. This meets and exceeds the 50% strategic target of LP Policy H4 as well as the 35% minimum affordable housing requirement of LPP2 Policy DMH7.

- 6.38. In terms of how the proposed affordable provision sits against the existing affordable housing provision, As illustrated in Table 2, the existing Estate is made up of a total of 199 affordable units which comprise 715 habitable rooms and cover an area of 12,177 square metres. Estate-wide, this is the minimum provision that must be replaced in Social Rent tenure as part the Proposed Development. As evident from paragraph 6.37, the Applicant is fully committed to the proposed 51.7% affordable housing offer and this underpins the Proposed Development. As such, the Proposed Development will result in a significant uplift in affordable housing provision and result in a net gain of 40 units, 91 habitable rooms and 5,686 square metres of floorspace. This comprises 15,131 square metres of Social Rent replacement floorspace which equates to 199 units and 681 habitable rooms. There is a very slight reduction in habitable rooms (by 34 habitable rooms) in order to provide a vastly improved affordable housing mix which better caters for meeting the existing and expected needs of the Estate itself. However, there is a net gain in floorspace by 2,954 square metres ensuring equivalent, plus uplift, in accordance with LP Policy H8. The remaining 2,732 square metres of affordable housing floorspace will take the form of London Affordable Rent units, equating to 40 units and 125 habitable rooms.
- 6.39. In accordance with LP Policy H8, Part D, the Proposed Development overall will therefore ensure the replacement of equivalent affordable housing floorspace. In addition and in accordance with Part E, it will also result in an uplift in affordable housing provision in terms of floorspace, unit numbers and habitable rooms. The uplift in affordable housing provision is illustrated within Table 7 of the submitted Development Specification Statement entitled "Affordable Provision Net Gain".
- 6.40. In terms of affordable tenure, on an Estate-wide basis, 83% of the affordable provision will come forward as Social Rent and 17% will come forward as London Affordable Rent based on total unit numbers and with the latter representing the entire affordable net gain in unit numbers. Whilst this does not wholly conform with the tenure split breakdown set out under LP Policy H6 or LPP2 DMH7, the proposed tenure mix has been determined with consideration to the needs of existing returning residents as well as the wider needs of the borough. It is therefore considered acceptable and provides a significant contribution towards the borough's greater demand for low cost rented homes in the form of Social Rent and London Affordable Rent, over and above that for intermediate products.

- 6.41. Furthermore, the tenure mix for the Outline Area is indicative and will be fixed at the point of future RMAs to ensure an effective distribution of tenures and units mixes across the Estate as a whole to contribute to the creation of mixed and inclusive community. This includes Social Rent Replacement homes and London Affordable Rent units as part of the affordable housing tenure mix alongside private market units which includes a proportion of private equity units as a further diversification of the tenure offer. For the purposes of illustrating how this could be achieved, an Indicative Tenure Distribution Plan is enclosed within the submitted Design and Access Statement on the basis of the indicative unit mix for the Outline Area of the HPA.
- 6.42. Overall, the Proposed Development on an Estate-wide basis therefore satisfies Parts A-D of LP Policy H8 in providing, as a minimum, replacement affordable floorspace of an equivalent amount and in Social Rent tenure to facilitate the return of existing residents. In addition, and in compliance with Part E of Policy H8, the proposals have been subject to viability testing and the submitted FVA in support of this HPA concludes that affordable floorspace provision as part of the Proposed Development is not viable. This includes both the re-provision and the “uplift” of affordable housing provision over and above replacement floorspace. However, the Applicant is fully committed to the proposed 51.7% affordable housing offer (based on floorspace) across the Estate in order to facilitate the delivery of good quality affordable new homes more generally within the borough which is a significant socio-economic and housing benefit in support of the proposals. In conclusion therefore, the proposals comply and exceed LP Policy H8 requirements and significantly exceed the 35% requirement set out under LPP2 Policy DMH 7.

Detailed First Phase

- 6.43. In facilitating the early delivery of the new and replacement homes in accordance with LBH’s decanting and re-housing strategy, the Detailed First Phase comprises a high level of affordable housing provision. Of the 5,948 square metres of residential floorspace, 3,266 square metres will be affordable, equating to 54%. This indicatively comprises 40 affordable units and 142 habitable rooms, all in Social Rent tenure as replacement homes for returning residents.

6.44. The majority of the affordable units will be located within Block B with four units provided in Block A. This is considered to represent an appropriate distribution alongside the delivery of private homes to ensure that overall the Detailed First Phase creates a balanced and inclusive community whilst safeguarding LBH's longer-term operational and management requirements.

Dwelling Mix

6.45. As outlined in the preceding sub section, NPPF 62 explains that in the context of determining the minimum number of homes and delivery a sufficient supply of the homes, *"the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies"*.

6.46. LP Policy H10 states that *"schemes should generally consist of a range of unit sizes"* and Policy H10 provides a set of criteria which applicants and decision-makers should have regard to when determining an appropriate mix of unit sizes. This includes considering the following: the local needs and demands evidence base (such as a Strategic Housing Market Assessment); the need to achieve a mixed and inclusive neighbourhood; the nature and location of the site; the need to optimise the housing potential of the site; and, the need for family housing as well as the role of smaller one and two bedroom units in freeing up existing family housing. In this context, LP Policy H10 is clear that *"...a higher proportion of one and two bed units [are] generally more appropriate in locations which are closer to a town centre or station with higher public transport access and connectivity"*.

6.47. LPP2 Policy DMH 2 states that LBH LPA will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the latest information on housing need. Hillingdon's Strategic Housing Market Assessment ("SHMA") (2018) identifies a need for larger affordable units, particularly two bedroom (45%) and three bedroom (38%) properties. In terms of private market housing needs, the SHMA similarly identifies a need for larger units, particularly three bedroom (61%), four bedroom (18%) and two bedroom (17%) properties.

6.48. It is noted that nearby residential schemes to include Silverdale Industrial Estate and Chailey Industrial Estate have been consented on the basis of providing 17% and 15% family sized units (three bedroom plus) respectively. This is on the basis of up-to-date housing needs and demand assessments across different tenures to include private sale and reflective of the town centre locations of these sites. Whilst the indicative unit mix across the Illustrative Masterplan, to include the fixed mix for the Detailed First Phase, is largely driven by the housing needs generated by the existing Estate, these neighbouring schemes provide a comparable context for the Proposed Development. Alongside up-to-date housing needs and demand analysis, this has been fully acknowledged and tested throughout the pre-application consultation process with LBH LPA and GLA Officers as demonstrated further below.

Illustrative Masterplan

6.49. The proposed unit mix that underpins the Illustrative Masterplan is indicative on the basis of a maximum residential floorspace of 34,533 square metres.

6.50. As set out in Table 21 below, it represents a cumulative indicative unit mix which combines a maximum unit mix for the Outline Area based on a maximum residential floorspace of 28,585 square metres and fixed unit mix for Detailed First Phase based on 5,948 square metres of residential floorspace.

Table 21: Cumulative (indicative) housing size and tenure mix across Illustrative Masterplan

	1 Bed	2 Bed	3 Bed	4 Bed	Total
Social Rent Replacement Homes	54 no. 2,743 sqm 108 hr	80 no. 6,150 sqm 240 hr	57 no. 5,280 sqm 285 hr	8 no. 958 sqm 48 hr	199 no. 15,131 sqm 681 hr
London Affordable Rent	9 no. 450 sqm 18 hr	24 no. 1,680 sqm 72 hr	7 no. 602 sqm 35 hr	N/A	40 no. 2,732 sqm 125 hr
Private	115 no. 5,789 sqm 230 hr	123 no. 8,842 sqm 369hr	23 no. 2,039 sqm 115hr	N/A	261 no. 16,670 sqm 714hr
TOTAL	178 no. 8,982 sqm 356 hr	227 no. 16,671 sqm 681 hr	87 no. 7,922 sqm 435 hr	8 no. 958 sqm 48 hr	500 no. 34,533 sqm 1,520 hr

- 6.51. On the basis of the indicative cumulative mix across the Illustrative Masterplan, the Proposed Development provides for 36% of one bedroom units, 45% of two bedroom units, 17% of three bedroom units and 2% of four bedroom units. As noted above, the mix is largely driven by the Estate’s own assessed housing needs in terms of re-provision alongside need and demand, to include current market trends, for certain unit types across the additional affordable London Affordable Rent (“LAR”) and private sale tenures.
- 6.52. This cumulative mix has informed the Indicative Unit Range Mix (%) for the Estate as a whole, as can be seen in Table 22 below. Whilst only indicative, Tables 21 and 22 will guide any future RMAs to ensure that the mix remains balanced and wholly appropriate for the scheme at this location in accordance with LPP2 Policy DMH 2 and LP Policy H10.

Table 22: Indicative Unit Range Mix (%) across the Illustrative Masterplan

	1 Bed	2 Bed	3 Bed	4 Bed
Indicative Unit Range (%)	16 - 36%	25 - 45%	15 - 17%	0– 2 %

- 6.53. In accordance with LP Policy H10, the Site’s highly sustainable, town centre location means that it is less suited to a high proportion of family units. On this basis, as proposed, and in light of the identified needs of returning and new residents to the Estate, a 15-17% indicative unit range for three bedroom homes estate-wide, plus the potential for a small proportion of much larger, family units in the form of four bedroom units (up to 2%) is considered to be appropriate for the Site. As noted at paragraph 6.48, this closely aligns with what has recently been consented on neighbouring development sites, to include at Silverdale Industrial Estate and Chailey Industrial Estate, as part of the overall scheme mix as approved and supported by up to date housing need and demand assessments. This is also due to the consensus as set out in LP Policy H10 that one and two bedroom units are more appropriate and in-demand in such central, town centre locations, and ultimately key to scheme deliverability in viability terms (alongside grant).

Detailed First Phase

- 6.54. Table 23 below sets out the fixed unit mix proposed to come forward as part of the Detailed First Phase which will deliver 80 new homes across Blocks A and B.
- 6.55. It represents the “kick-start” phase of the Estate’s wider regeneration and will facilitate the early delivery of housing. It will therefore provide replacement homes for returning Estate residents as a priority and in lines with LBH’s decanting and re-housing strategy. As such the proposed unit mix been informed by the Estate’s own assessed housing needs in terms of both need and demand as well current market trends for the private sale units. This has resulted in a higher provision of family homes (three and four bedroom units) upfront at 25% of the mix, a significant proportion of which will be affordable (65%). Alongside this and in-keeping with the Site’s town centre and PTAL 4 and 5 rating location, 29% of the units will be one bedroom and 46% of the units will be two bedroom so is considered wholly appropriate in planning policy terms.
- 6.56. This forms part of the 500 unit total of the Proposed Development and fully complies with the cumulative unit mix set out in Table 21 above.

Table 23: Housing size and tenure mix across Detailed First Phase

	1 Bed	2 Bed	3 Bed	4 Bed	Total
Social Rent Replacement Homes	8 unit no 16 hr 423 sqm	19 unit no 57 hr 1,515 sqm	9 unit no 45 hr 850 sqm	4 unit no 24 hr 478 sqm	40 unit no 142 hr 3,266 sqm
London Affordable Rent	N/A	N/A	N/A	N/A	N/A
Private	15 unit no 30 hr 751 sqm	18 unit no 54 hr 1,322 sqm	7 unit no 35 hr 609 sqm	N/A	40 unit no 119 hr 2,682 sqm
TOTAL	23 unit no 46 hr 1,174 sqm	37 unit no 111 hr 2,836 sqm	16 unit no 80 hr 1,460 sqm	4 unit no 24 hr 478 sqm	80 unit no 261 hr 5,948 sqm
TOTAL (%) (based on unit no)	29%	46%	20%	5%	100%

- 6.57. On the basis of the above, the HPA accords with LP Policy H10 and LLP2 Policy DMH2 on housing mix in taking into account housing needs of the Estate and supported by a needs and demands analysis in support of the mix for private sale tenure.

Housing Design Standards and Quality of Accommodation

- 6.58. In promoting the role of the planning and development process in creating high quality places, NPPF 130 is clear that planning policies and decisions should ensure that developments “*will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development*” and are developments “*...which promote health and well-being, with a high standard of amenity for existing and future users...*”. This refers out to footnote 49 which expects local planning policies to make use of the nationally described space standards to inform internal living arrangements.
- 6.59. LP Policy D6 states that “*housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures*”. It then goes on to specify the key considerations that should inform proposals to ensure such quality can be achieved. This includes maximising dual aspect units, providing adequate daylight and sunlight and protecting the privacy of residents.
- 6.60. LP Policy D6 also set outs minimum requirements for private internal spaces drawn from the nationally described space standards. The Mayor’s Housing SPG (March 2016) and draft GLA Good Quality Homes for All Londoners Guidance (October 2020) provide a further framework to guide the quality of new residential units.
- 6.61. At a local level and consistent with national and regional policy, LPP2 Policy DMHB16 sets out that “*all housing development should have an adequate provision of internal space in order to provide an appropriate living environment*” and states that this should meet or exceed the most up to date space standards. Supporting LPP2 paragraph 5.40 confirms “*single aspect dwellings should be avoided*”.

6.62. There is no specific % target in planning policy terms for the level of dual aspect provision expected within new developments given site-specific circumstances will dictate what can be delivered. It is noted that the neighbouring Chailey Industrial Estate and Fairview Business Centre schemes, as consented, achieve a 54% and 46% dual aspect provision respectively. In both cases, LBH LPA and GLA Officers considered this to represent appropriate optimisation of each Site.

Illustrative Masterplan

6.63. The design principles set out in the submitted Design and Access Statement provide further details on the standards that should be applied to development within the Outline Area of the HPA at the detailed design stages and these will guide the respective RMAs. This includes a requirement that all units will meet the nationally described space standards and the provision of dual aspect units will be maximised, with single aspect north facing units to be minimised in accordance with LP Policy D6.

6.64. In demonstrating how the above can be successfully delivered across the maximum residential floorspace (GIA) of 28,585 square metres for the Outline Area, the indicative unit mix which underpins the Illustrative Masterplan assumes, as a minimum, the nationally described space standards for each unit type.

6.65. In keeping with the objectives of national, regional and local planning policy as well as LBH's commitment to improve the standard of residential accommodation across the borough as a whole, the Illustrative Masterplan shows how, through careful design, the Proposed Development presents opportunities for these minimum space standards to be exceeded and could achieve 76% dual aspect units based on the maximum parameters. In turn, there are no north-facing single aspect units and 100% of the larger three and four family bedroom homes are dual aspect. Table 24 below outlines the indicative target unit sizes applied to the indicative unit mix across the Illustrative Masterplan. However, it is important to note that this configuration remains indicative only at this stage with the specific unit sizes and arrangement of these within the Outline Area to be subject to the detail that comes forward as part of future RMAs on a zone by zone / phase by phase basis.

Table 24: Indicative Unit Sizes across the Illustrative Masterplan

Unit Type	Nationally Described Space Standard (sq.m)	Indicative Unit Size (sq.m)
1 Bedroom 1 Person (Flat)	37	37
1 Bedroom 2 Person (Flat)	50	50
1 Bedroom 2 Person (Accessible)		60
2 Bedroom 3 Person (Accessible)	61	80
2 Bedroom 4 Person (Flat)	70	70
2 Bedroom 4 Person (Accessible)		85
2 Bedroom 4 Person (Duplex)		88
2 Bedroom 4 Person (House)	79	88
3 Bedroom 5 Person (Flat)	86	86
3 Bedroom 5 Person (Duplex)	93	102
3 Bedroom 5 Person (House)		113
3 Bedroom 6 Person (Flat)	95	95
4 Bedroom 7 Person (Duplex)	119	120

- 6.66. When compared to the quality and standard of residential accommodation currently on the Estate, the above represents a significant improvement. The Options Appraisal (October 2020), prepared by Savills as part of the review of the development interventions options for the regeneration of the Estate identified that the existing homes are not fit for purpose. This is in terms of environmental performance, space standards and accessibility, and are inefficient in terms of layout with a high habitable room to unit type ratio. As such, they do not meet current living standards.
- 6.67. The full redevelopment of the Estate through the Proposed Development therefore provides an opportunity to correct this and as shown through the indicative unit type layouts contained within the submitted Design and Access Statement, all units will be expected to be legibly laid out and fit for purpose over the longer-term in line with NPPF 130. This will be applied to all tenures, to include both private market and affordable units to ensure a tenure blind approach to high residential quality design in accordance with LP Policy D6 and LPP2 Policy DMHB16.

- 6.68. To provide adequate privacy for every home, the Development Zones and outline parameters have been established to ensure that development within the Outline Area will achieve minimum separation distances of 15 metres between blocks within the Estate and a minimum separation distances of 21 metres between facing windows of habitable rooms. This is in accordance with the Hillingdon Design and Accessibility Statement (“HDAS”) SPD (April 2006) and is discussed in further detail later on in this section in relation to the layout, height and massing considerations of the design.
- 6.69. On a block by block and unit by unit basis, the internal layouts will be arranged to ensure that there is no direct overlooking between habitable rooms. The Illustrative Masterplan has tested how this can be supplemented by a variety of design measures, where required, and as explored with LBH LPA Officers during the pre-application process. This could include the staggering of windows to ensure they are not directly facing and the location of habitable room window openings onto adjacent non-habitable / non-principal habitable rooms window openings or cores. In addition, angled windows and obscure glazing can be incorporated along secondary frontages to ensure there is no direct risk of overlooking or loss of privacy whilst still maintaining sufficient levels of daylight and sunlight. This is in the interest of seeking to optimise the Site’s potential, as supported by both LBH LPA and the GLA Officers, whilst respecting and protecting future and existing residential amenity in accordance with LP Policy D6, the Mayor’s Housing SPG (March 2016), draft GLA Good Quality Homes for All Londoners Guidance (October 2020) and LBH LPA’s HDAS.
- 6.70. The final unit layouts and requirement for any integrated design measures will be determined through the detailed design of future Development Zones and based on the configuration of built form alongside confirmed unit mix, in keeping with the maximum parameters for the Outline Area. Such considerations will therefore be addressed and considered again in detail on a zonal or phased basis as part of each RMA.
- 6.71. On the basis of the above, the design principles secured through the submitted Design and Access Statement and the outline parameters, it is considered that the Proposed Development will provide a high quality living environment for both returning and new residents in accordance with LP Policy D6 and LPP2 Policy DMHB16. It will contribute to an improved standard of residential accommodation across the borough’s housing stock as a whole and therefore positively reinforce the role of planning and development in achieving this, as sought by NPPF 126.

Detailed First Phase

- 6.72. Whilst the Detailed First Phase sits outside of the outline parameters, it has been designed in conjunction with these and informed by the same design principles to ensure a consistent approach to the delivery of high quality residential accommodation.
- 6.73. 50 of the 80 units proposed to come forward across Blocks A and B will be dual aspect. This equates to 62.5% ensuring, in accordance with LP Policy D6 and the expectations of LLP2 paragraph 5.40, that the provision of single aspect units has been minimised and none of these are north facing units.
- 6.74. As evident from the Table 25 below, all units will meet or exceed the minimum nationally described space standards and have minimum ceiling heights of 2.5m for at least 75% of the GIA as well as sufficient areas of in-built storage. This is in full compliance with NPPF 130, LP Policy D6, the Mayor's Housing SPG (March 2016) and LPP2 Policy DMHB16.

Table 25: Proposed Unit Sizes for the Detailed First Phase

Unit Type	Nationally Described Space Standard	Proposed Unit Size
1 Bedroom 2 Person (Flat)	50	50
1 Bedroom 2 Person (Accessible)		60
2 Bedroom 3 Person (Accessible)	61	80
2 Bedroom 4 Person (Flat)	70	70
2 Bedroom 4 Person (Accessible)		85
2 Bedroom 4 Person (Duplex)	79	88
3 Bedroom 5 Person (Flat)	86	86
3 Bedroom 6 Person (Flat)	95	95
4 Bedroom 7 Person (Duplex)	119	120

- 6.75. In terms of privacy, the residential blocks are set back off adjacent primary and secondary vehicular routes, via up to 3 metre wide corridors of defensible space along the perimeters. This will comprise high quality landscaping to include new tree planting and rain gardens as well as private gardens which will sit between the front of the property and the pedestrian walkway.

- 6.76. This will similarly be the case for those units adjoining the communal (internal) podium garden located between Blocks A and B where private gardens / courtyards plus defensible planting will provide an appropriate physical, visual and acoustic buffer, as well as greening. As a result, there will be a clear distinction between communal (private) and private amenity space in safeguarding the privacy of residents and ensuring that the usability of these spaces and units is not undermined.
- 6.77. In the interest of maintaining the above and high standards of residential accommodation consistently across the blocks in line with the design principles for the Proposed Development as a whole, no residential units are proposed at ground floor within the northern wing of Block A fronting Pump Lane. For those units on the upper floors, private amenity space will be provided on the eastern and western elevations so as to not be located onto Pump Lane. The provision and quality of external amenity space is considered further later on in this section.
- 6.78. In terms of overlooking, Blocks A and B have been arranged to achieve a 21 metre separation distance between facing habitable windows. This is maintained north-south and east-west between the “internalised” elevations which face onto the communal garden from podium level and above. As a result, there is no risk of loss of privacy or overlooking between units within the Detailed First Phase itself. In respect of the relationship of these blocks with neighbouring properties, the northern building of Block A has been set back from the Site’s frontage to ensure a 17.8 metre separation distance with existing built form on the opposite side of Pump Lane, as the closest properties of relevance to the Detailed First Phase.
- 6.79. Furthermore, and in futureproofing the Proposed Development, the outline parameters have been designed to ensure a minimum 15 metre separation distance between the outer building footprints of the Development Zones of the Outline Area and the Detailed First Phase. For Development Zones 2 and 5 to the south and east of the Detailed First Phase respectively, an 18 metre separation distance will be achieved between the built edges of Blocks A and B and the outer building footprint of the Development Zones. This therefore fully accords with LBH LPA’s HDAS and will prevent any risk of overbearingness whilst also protecting the amenity of those living within the Detailed First Phase and future residents of the adjacent later phases.

6.80. On the basis of the above, the Detailed First Phase of the Proposed Development is considered to conform with NPPF 130, LP Policy D6, and LPP2 DMH16 and will provide a high standard of living accommodation for returning and new residents to the Estate. This is whilst also safeguarding the amenity of neighbouring residents and occupiers as well as those of future phases of the Outline Area of the Proposed Development by being comprehensively planned in as part of the Illustrative Masterplan.

Housing Accessibility

6.81. In keeping with the above, and achieving “*well designed places*”, NPPF 130 (f) expects new development to “*create places that are safe, inclusive and accessible*”. Again, this references out to footnote 49 where it states the need for planning policies to “*...make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties*”.

6.82. LP Policy D7 states that at least 10% of dwellings must be designed to meet Building Regulation requirement M4(3) as ‘wheelchair user dwellings’. All other dwellings must meet Building Regulation requirement M4(2) as ‘accessible and adaptable dwellings’.

6.83. The above requirement is also reflected in LPP2 Policy DMHB16, which outlines that within all major developments, at least 10% of new housing should be accessible or easily adaptable for wheelchair users.

Illustrative Masterplan

6.84. It is important to note that the requirements of LP Policy D7 and LPP2 Policy DMHB16 are to be applied to the Proposed Development as a whole, inclusive of both the Detailed First Phase and Outline Area. It means that overall and on the basis of maximum residential floorspace (GIA) of 34,533 square metres and indicative 500 unit provision, 50 units must be designed to meet Building Regulation M4(3) as wheelchair user dwellings and all other units must be designed to meet Building Regulation requirement M4(2) as accessible and adaptable dwellings.

6.85. The estate-wide approach to accessibility is set out in the submitted Design and Access Statement and will be applied to the Outline Area through the design principles. These will require each future RMA to provide details of the number and distribution of wheelchair user dwellings proposed within that Development Zone and/or phase and demonstrate how this contributes to the delivery of 10% across the Estate as a whole. The Illustrative Masterplan shows one way in which these principles could be implemented across the Estate on the basis of the cumulative indicative unit mix and in securing a total of 50 wheelchair user dwellings. This demonstrates that the Outline Area will contribute to satisfying the policy requirements of LP Policy D7 and LPP2 Policy DMHB16 as part of the Proposed Development.

Detailed First Phase

6.86. A total of 8 units within the Detailed First Phase will be wheelchair user dwellings designed to meet Building Regulation M4(3). These will be distributed across Blocks A and B and provide accommodation within a range of unit types and sizes, as set out in Table 26 below. 6 of the units will be affordable in the form of Social Rent replacement units and 2 of the units will be for private market sale. The proposed mix has been informed by the Estate's own demand to accommodate returning residents as well as identified borough-wide needs across tenures. All other units have been designed to meet Building Regulation requirement M4(2) as accessible and adaptable dwellings.

Table 26: Proposed Wheelchair User Dwelling Mix

Unit Type	No. of Units	Unit Size (sqm)	Tenure
1 Bedroom 2 Person	1	60 sqm	Social Rent Replacement
2 Bedroom 3 Person	1	80 sqm	Social Rent Replacement
2 Bedroom 4 Person	4	85 sqm	Social Rent Replacement
2 Bedroom 4 Person	2	85 sqm	Private
Total	8		

6.87. Overall, this proposed provision of wheelchair user dwellings equates to 10% of the total 80 number of units proposed to come forward within the Detailed First Phase. This element of the Proposed Development is therefore wholly compliant with LP Policy D7 and LPP2 DMHB16 independent of the Outline Area and provides an upfront and meaningful contribution to the wider requirements of the Estate.

Non-Residential Uses

- 6.88. Chapter 8 of the NPPF promotes the creation of healthy and safe communities. NPPF 92 states that this should “*promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other...*” and the provision of strong neighbourhood centres, easy street layouts and active street frontages are identified as means of facilitating this. Planning policies and decision-making are therefore expected to “*plan positively for the provision and use of shared spaces, community facilities...and other local services to enhance the sustainability of communities and residential environments*” as well as provide for social, recreational and cultural needs (NPPF 93).
- 6.89. LP Policy GG1 reinforces the above at a regional level, recognising that in building strong and inclusive communities, development must “*provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation*”. LP Policy S1 therefore resists the loss of social infrastructure, to include community facilities, unless it is re-provided; forms part of wider public service transformation plan to meet future needs; or, sustains and improves other services.
- 6.90. LPP2 Policy DMCI 1 also seeks to retain existing community facilities only permitting the loss of existing provision if it can be demonstrated that the specific use is no longer required. This includes confirming that it will not lead to a shortfall in provision and / or the facility is no longer appropriate and any replacement / relocated provision offers a level of accessibility and standard of provision at least equal to that of the existing facility.

The Illustrative Masterplan

- 6.91. The Proposed Development is predominantly residential in nature with only one element of non-residential proposed, in the form of a community centre (Use Class F2(b)). This sits within Development Zone 4 of the Outline Area of the HPA, as can be seen on Parameter Plan 1. The Detailed First Phase comprises entirely residential uses.

- 6.92. The outline parameters allow for a maximum of up to 140 square metres of non-residential community floorspace (GIA) and it is proposed that this will provide replacement provision for the current space located at the ground floor of the existing Skeffington Court building which equates to 115 square metres (GIA). The existing provision is limited in function due to an inefficient layout and poor accessibility. It is also not sufficiently served by daylight and sunlight due to only a few narrow window openings. For context, a floorplan of the existing community facility is contained within the submitted Design and Access Statement. From on-going consultation with existing residents it is understood that the space is underutilised as a result and used primarily to host a local sewing club and by the Hayes Town Centre Residents Association.
- 6.93. As a minimum, the equivalent amount of floorspace will be provided as part of the Proposed Development and therefore in accordance with LP Policy S1 and LPP2 Policy DMCI 1 there will no loss in existing community provision on the Site. In turn, it will be of a significantly improved quality and subject to the detailed design of later phases through the flexibility built into the maximum non-residential floorspace parameter, could result in a net gain of up to 25 square metres in community floorspace. The centre will continue to serve the needs of existing and returning residents but through a high quality design and layout provide a multi-functional space which can also serve the needs of future residents and those within the wider local community. Discussions are on-going within LBH and in consultation with existing residents to identify the types of activities, uses and events that the new provision could accommodate. It is therefore considered to be wholly compliant with the requirements of LP Policy S1 and LPP2 Policy DMCI 1 and will result in wider social benefits.
- 6.94. In accordance with NPPF 92 and LP Policy GG1, the outline parameters fix the proposed community centre within Development Zone 4 so that it provides an active frontage onto the proposed Community Square, as new Public Open Space established through the hard and soft landscaping parameters of Parameter Plan 5. Through the application of the design principles, as set out in the submitted Design and Access Statement, this will form the heart of the regenerated Estate at the juncture of key north-south and east-west movement routes (as established through Parameter Plan 4). It will therefore provide a safe, inclusive and accessible new facility which will seek to “...accommodate, encourage and strengthen...” the community in accordance LP Policy GG1. The Illustrative Masterplan shows one way in which this could be comprehensively achieved.

Design Approach

6.95. In advocating the role of planning and development in the creation of high quality, beautiful and sustainable buildings as well as places, NPPF 126 is clear that *“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.”* NPPF 130 goes on to state that *“planning policies and decisions should ensure that developments:*

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

6.96. With regard to the above, NPPF 134 expects weight to be given to development which a) reflects local design policies and government guidance; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, provided they fit in with the overall form and layout of their surroundings.

- 6.97. LP Policies D1-3 and D8 apply to the design and layout of development whilst LP Policy D9 relates specifically to height and massing in the form of tall buildings. These policies are discussed in further detail throughout this section. In terms of overarching design considerations, LP Policy D1 outlines the importance at a local level of understanding the form and character of different areas in order to understand its capacity for growth. LP Policy D2 sets out the considerations that should inform the density of development in ensuring that it is sustainable and that there is adequate infrastructure in place or that it can be planned in accordingly.
- 6.98. At a local level, LPP2 Policies DMHB11 and DMHB12 provide a set of design principles which seek to ensure that new development is designed to the highest standards, integrated into the surrounding area and accessible. LPP2 Policy DMHB10 relates specifically to high buildings and structures and is consistent with LP Policy D9 in establishing a criteria which must be satisfied to ensure such proposals respond well to the local context. Site Allocation SA23 contains a set of guiding principles for the redevelopment of the Estate and which, as such, seeks improved connectivity, new public open space, high quality design and the integration and enhancement of the Grand Union Canal.
- 6.99. The design principles set out in the submitted Design and Access Statement relate to the Proposed Development as a whole (inclusive of both the Detailed First Phase and Outline Area) and seek to build upon the existing Estate's context to ensure the sensitive integration of future development within its surroundings. This is whilst recognising the emerging context being established through neighbouring development sites and the opportunity that the regeneration of the Estate provides in contributing to raising the standard of design more generally in an area, in accordance with NPPF 134.
- 6.100. A design-led approach has been taken in order to understand the Site's capacity for growth and create a high quality new residential environmental. This has been informed by a detailed study of the surrounding form, character and architectural narrative in accordance with LP Policy D1 and as can be seen from the submitted Design and Access Statement.

6.101. As set out in Section 3 of this Statement, it has been an iterative process underpinned by extensive discussions with LBH LPA Officers and the GLA, as well as existing residents, the local community and key stakeholders. Careful consideration has been given to the comprehensive siting, scale and massing of the Proposed Development in relation to the existing street pattern and built form, the impact from key views and in relation to neighbouring heritage assets. This is in addition to retaining and creating areas of open space, public realm and pedestrian / cycle routes through the Site.

Layout

6.102. In developing the objectives of LP Policies D1 and D2, LP Policy D3 provides more detail on what is expected from a design-led approach to development. It provides a set of urban design principles that should guide development proposals and relate to form and layout; experience; and quality and character.

6.103. This includes enhancing the local context through new built form that “...*positively responds to local distinctiveness...*”; encourages and facilitates active travel; is safe, secure and inclusive; provides active frontages and “...*environments that are comfortable and inviting for people to use...*”; and is of high quality with opportunities for urban greening maximised. The Mayor’s Housing SPG (2016) and Draft Good Quality Homes for all Londoners (October 2020) in particular provide further guidance in support of these policies.

6.104. At a local level, Policy DMHB11 states that “...*new buildings will be required to be designed to the highest standards and, incorporate principles of good design...*” and sets out a number of design-led principles consistent with those identified under LP Policy D3. These expect development proposals to harmonise with the local context taking account of building plot sizes, street patterns, building lines and setbacks as well as the streetscape and architectural composition. Development is also required “...*to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential*”.

6.105. Whilst the Proposed Development comprises two separate elements (the Detailed First Phase and the Outline Area), in ensuring a consistent approach to the delivery of a high quality environment across the Estate, its redevelopment must be and has been considered holistically. The Detailed First Phase forms an intrinsic part of the wider regeneration of the Estate and therefore has been designed to function as a standalone component as well as align with the wider aspirations being applied to the Outline Area through the established parameters. This is evident through the Illustrative Masterplan, as underpinned by the design principles. The Proposed Development is therefore considered against the relevant planning policies on this basis.

Illustrative Masterplan

6.106. The layout comprises four perimeter blocks which are evenly distributed north-south across the Site and supplemented by a narrow strip of development along the eastern edge. These frame a re-aligned Austin Road, as the Estate's primary movement corridor and creating a defined central spine which runs through the Site. This leads to a new area of public open space in the form of the Community Square which sits at the southern juncture of the re-aligned Austin Road, as a focal point of the Estate. It provides a meeting point for new and enhanced east-west public connections through the Site and leads onto an extensive area of new public realm which leads to the Grand Union Canal to the south.

6.107. The movement routes through the Site and careful placement of open space and public realm where they meet have been informed by identified desire lines within the area and seek to provide legible connections which are safe, secure and inclusive in accordance with LP Policy D3.

6.108. The first three Development Zones, located along the western boundary, are rectangular in shape and separated via connecting streets. Each block is made up of a series of four interconnected elements of varying heights and enclose a first floor podium providing communal (private) amenity space and public realm.

- 6.109. The fourth Development Zone, located at the southern end of the Site features an L-shaped block and one standalone smaller rectangular block which together loosely enclose a central area of green amenity space, open to the south and west to respond to and integrate with the parallel streets and Grand Union Canal. In accordance with the policy requirements of Site Allocation SA23 this will provide an enhanced canal-side frontage which through natural surveillance and adjoining areas of open space and public realm will achieve an outdoor environment that is “...comfortable and inviting for people to use” as sought by LP Policy D3. This will improve the experience of this overall space and in line with the objectives of Site Allocation SA23 encourage canal-side activity and maximise its recreational potential.
- 6.110. The proposed layout and block configuration has been developed having regard to LBH’s HDAS in relation to separation distances between new and existing properties as well as within the scheme itself in order to protect privacy, overlooking and outlook as required by with LP Policy D3 and DMHB11. The Development Zones, as established through Parameter Plan 2, have therefore been configured to ensure new development can achieve a minimum 21 metre separation between facing habitable rooms both of the proposed new blocks, across the ground floor courtyards and first floor amenity podiums, as well as with neighbouring properties. This includes a separation distance of 20 metres between the outer building footprint of Development Zone 5, as applied within the Illustrative Masterplan, and the existing terraced properties to the east (at Little Road) as well as an average separation distance of 21 metres between the proposed block J and the building line of the locally listed warehouse (also to the east). This will ensure adequate separation between existing and potentially new habitable room window openings (the latter as a result of any conversion of the locally listed building, should this happen in the future).
- 6.111. In accordance with LPP2 Policy DMHB11, the above is in the interest of future proofing the building’s potential future residential conversion and provides opportunity for improved public realm along its frontage, contributing to an enhanced overall setting for this building, as discussed further in this section.

- 6.112. In addition to the above and in accordance with LBH's HDAS, the outline parameters ensure a minimum separation distance of 15 metres between blocks, as can be seen from Parameter Plan 2. This is in the interest of preventing overbearingness within the Site and providing a building plot coverage which responds positively to the surrounding urban context as well as established street patterns. In accordance with LP Policy D3 and LPP2 Policy DMHB11, it is therefore considered to result in a form and proportion that is legible and permeable at a human, street-based scale.
- 6.113. Overall, the distribution and clear characterisation of Development Zones amongst proposed landscaping, public realm and open space results in a clear definition of public and private environments. It facilitates movement through the Sites and provides green and open space at convenient locations, creating a series of interconnected spaces and corridors, to encourage activity and social interaction as well as maximise opportunities for urban greening in accordance with LP Policy D3. Defensible green landscaping then provides appropriate setbacks between the public movement routes and new built form, providing softer edges. Together, this supports the integration of the Proposed Development with the existing urban built form with high quality, place making principles at the fore.
- 6.114. As is evident from the above and the Illustrative Masterplan, the design-led approach has had regard to the aspirations for regeneration set out in LPP2 and through sensitive integration, positively contributes to the Site's position adjacent to the Grand Union Canal in accordance with the SA23 site allocation policy criteria. As a result, it optimises the Site's capacity to provide development which is appropriate within its existing and emerging context in accordance with NPPF 130, LP Policies D1-3 and LPP2 Policy DMHB11.

Detailed First Phase

- 6.115. The Detailed First Phase comprises the perimeter block at the northern end of the site, fronting Pump Lane. It will sit to the west of the re-aligned Austin Road and to the east of existing Crown Close. The built form will comprise two adjoining L-shaped blocks which will vary in height and enclose a podium garden area at the centre, with car parking provision at ground floor below. The podium garden area will provide private external amenity space as well as communal (private) external amenity space to serve future residents. This will include child's play space.

- 6.116. In line with principles evident across the Illustrative Masterplan, the configuration of Blocks A and B within a perimeter form which is framed by streets and movement corridors, provides a definitive and consistent approach to the spatial arrangement of building footprint across the Estate. It endorses the existing role and layout of streets within the surrounding urban context which provide breaks in the urban grain. It also provides a transition between the larger building floorplates of the commercial uses to the west and the smaller building floorplates of terraced residential properties to the east. In accordance with LP Policy D3 and LPP2 Policy DMHB11, it is therefore considered that the Detailed First Phase harmonises with and seeks to enhance the Site's contribution to the local context.
- 6.117. Block A provides a strong new frontage onto Pump Lane which becomes active at ground floor as the block extends into the Site and south along the re-aligned Austin Road. As sought by LP Policy D3 in contributing to the experience of a place, this creates interest and liveliness within the streetscene which responds positively to adjacent frontages and is continued into the Estate through the extension of a pedestrianised edge which runs around the full extent of the two blocks.
- 6.118. The edge conditions along the eastern and western facades of Blocks A and B will ensure that the duplex units located at the base of these blocks benefits from a defensible space of up to 3 metres. This will comprise of private gardens, physical screening and landscaping between the building footprint and the adjacent movement corridor.
- 6.119. The edge condition of the southern element of Block B, adjoining the secondary internal estate road, will feature single storey homes with 2 metre deep front gardens, supplemented by a multi-use corridor of landscaping, pedestrian access and sustainable drainage. This provides a "living street" with its own character defined by the change in surface, scale and layout when compared to the eastern and western edges. Internally within the blocks, the edge of the communal (private) podium garden will be made up of 2 metre deep private external amenity spaces plus an 800 millimetre strip of defensible space that will run around the perimeter to provide screening and privacy for residents.

- 6.120. These five differing edge conditions comprise new areas of public realm and landscaping which not only contribute to the greening and sustainable drainage management of this first phase but also perform as defensible space. It allows for the further internalisation of the private residential environment of Blocks A and B, physically and visually assisting in the definition of the extent of the public environment in accordance with LP Policy D3.
- 6.121. Overall, the Detailed First Phase, both as a standalone element and as part of the wider Illustrative Masterplan is considered to conform with the expectations of NPPF 130, LP Policy D3 and LPP2 Policy DMHB11. It demonstrates principles of good design and place-making which respond well to the local context and are in-keeping with the wider design-led objectives for the regeneration of the Estate as a whole.

Height and Massing (inclusive of Tall Buildings Assessment)

- 6.122. LP Policy D9 identifies a specific set of impacts and considerations that should inform the placement, height and massing of tall buildings. It is clear that what constitutes a “tall” building will vary depending on the locality but in any event would not be less than 6 storeys (or 18 metres) in height. The provision for such should be informed by a plan-led and design-led approach, be of the highest standard of architecture and materials; and, contribute to improved legibility and permeability. It is expected that tall buildings will be designed to ensure they do not have an unacceptably harmful impact on the surrounding context in terms of visual, functional, environmental impacts, including wind, overshadowing, glare, strategic and local views as well as heritage assets. These should then be considered cumulatively to demonstrate they are appropriate and acceptable overall.
- 6.123. At a local level, LPP2 Policy DMHB10 provides a set of criteria that “*high buildings and structures*” will be expected to satisfy. This aligns with LP Policy D9 in needing to be appropriately located, to include Hayes town centre and other identified areas; in an area of high public transport accessibility; be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings; not have adverse impact on the microclimate of the site and surrounding area; and, be of high architectural quality. This includes complying with the relevant aviation requirements where appropriate.

- 6.124. As set out within the formal Description of Development, outline planning permission is sought for heights between 2 and 12 storeys. The Outline Area therefore has the potential to comprise “tall” buildings in accordance with the LP D9 definition (ie. 6 storeys and above) and the maximum height parameters have been established on this basis, as can be seen from Parameter Plan 3. In turn, the Detailed First Phase comprises heights of 8 and 6 storeys and so similarly comprises “tall” buildings. The Proposed Development therefore triggers the requirements of LP Policy D9 and LPP2 Policy DMHB10.
- 6.125. In terms of addressing the first of the policy requirements, the Site is located within Hayes Town Centre which LPP2 Policy DMHB11 identifies as an appropriate location for tall buildings and has a very good PTAL of between 4 and 5, with the higher rating achieved toward the Site’s southern edge (noting TFL’s 2031 forecast of entirely PTAL 4-5 for the Estate as a whole). In addition, the existing Estate contains a 15 storey residential building. This is equivalent to 12 storeys today when considered against current floor to ceiling height standards for residential development and establishes a precedent for tall buildings on the Site. This is a material consideration which should carry significant weight and weighs in favour of the acceptability of tall buildings again as part of the regeneration of the Estate. Furthermore, the Proposed Development will continue to sit within the existing height profiles already established on the Site.
- 6.126. The principle of tall buildings on the Site is therefore considered acceptable in accordance with LPP2 Policy DMHB11 and LP Policy D9 and subject to demonstrating compliance with the remaining criteria. These are considered further below but should be read in conjunction with submitted technical reports which provide a detailed assessment of each of the relevant impacts and considerations listed under both policies. This includes: Heritage; Town and Visual Impact; Daylight, Sunlight and Overshadowing; Wind and Microclimate; Noise; Air Quality; Fire and Servicing; Transport; Aviation; and Design and Access Statement; all of which are baseline and impact assessments submitted under the HPA in support of the “tall” building elements proposed as part of the wider regeneration.

Illustrative Masterplan

- 6.127. It is important to note that the height and massing strategy for the regeneration of the Estate, has been derived through collective consideration of both the outline and detailed elements together, in the form of the Illustrative Masterplan. It should therefore similarly be assessed comprehensively, on an estate-wide basis, against policy. Parameter Plan 3 establishes the repetition of heights across the first three perimeter blocks which sit centrally within the Site. Each comprises 8 storey northern and western edges which step down to 6 storeys to the east and south. A two story height is maintained along the eastern extent of the Site. Heights then gradually increase anti-clockwise from 8, to 9, to 10, to 12 storeys within the southern part of the Site.
- 6.128. Visually, the distribution of the height across the Site is considered to respond well to the surrounding context with the tallest elements positioned at the south of Site, adjacent to the canal, where the surrounding built form, both existing and emerging, is at its highest and where massing would be at the furthest point away from smaller scale existing residential properties sitting outside of the Site. This includes those on Little Road which sit directly to the east of the Estate and where the Proposed Development will sit at a consistent 2 storey height along this boundary which mirrors that of the adjacent properties. Within the centre of the Site, the greater height is concentrated at the northern and southern ends as consistent punctuations fronting movement corridors through the Site. The two-stage stepping down of the perimeter blocks along the eastern and western edges provides openings in the built form which break up the massing and provide a comfortable transition of a comparable scale at points in the Site where there is the greatest relationship with the surrounding context.
- 6.129. The submitted Heritage, Townscape and Visual Impact Assessment (“HTVIA”) has assessed the visual impact of the Proposed Development within 16 views (to include long-range, mid-range and immediate in accordance with LP Policy D9) and considered it in the context of immediate sensitivities, to include heritage assets, as well as the wider townscape which is considered to be of low sensitivity.

- 6.130. The assessment concludes that the massing of the scheme as a whole responds appropriately to both the immediate and the wider context of the Site. The lower heights proposed along the eastern boundary and centrally are of limited visibility within the wider townscape setting. The taller buildings are regarded to be carefully configured within the southern part of the Site and therefore respond to the presence of taller and landmark buildings to the south and east, to include those to come forward through the redevelopment of the Silverdale Industrial Estate. Alongside Chailey Industrial Estate, these developments will notably increase the surrounding height context which the scheme will then sit within.
- 6.131. The HTVIA identifies that the Proposed Development, together with the surrounding developments, provides the opportunity to frame the canal and its immediate landscape and towpath, improving its legibility and sense of security as well as the wider public realm. Thereby contributing to the enhancement of this townscape and visual amenity within Hayes Town Centre. In terms of the locally listed building adjacent to the Site's south eastern boundary, it is stated that the proposed tall buildings have been designed with clear references to the heritage asset and utilise a material palette and forms of articulation that draw on the Site's context. It also provides an opportunity for the creation of an improved public connection between Silverdale Road and the canal, thereby contributing to legibility and wayfinding as well as the enhancement of the setting of the locally listed building.
- 6.132. In accordance with LP Policy D9, the Proposed Development is therefore not considered to result in any adverse visual impacts and instead will *"reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding"*. This similarly satisfies the requirements of LPP2 Policy DMHB10.
- 6.133. In terms of functional impact, a Detailed Fire Statement and Outline Fire Strategy has been submitted as part of the HPA. These demonstrate that the buildings have been designed to ensure the safety of all occupants. The submitted Design and Access Statement provides details on accessibility, servicing and management of the buildings. It also sets out the principles of Secured by Design that have been considered and agreed in principle through consultation with the Metropolitan Police Designing out Crime Officer.

- 6.134. The submitted Transport Assessment confirms that there will be no impact on the transport network and that there is capacity within it to accommodate the proposed quantum of development, with access to sustainable modes of travel to only be improved as a result of the Proposed Development. Section 8 of this Statement provides a summary of the wider planning and socio-economic benefits that will be generated as a result of the regeneration of the Estate. Finally, as the tallest element of the proposals extends marginally into the Heathrow Flight Path Zone consultation has been undertaken with the relevant aviation authorities and a radar assessment has been undertaken by NATS. This has been positive and is summarised in the submitted Aviation Statement, confirming no impact as a result of the Proposed Development.
- 6.135. In accordance with LP Policy D9 and LPP2 Policy DMHB10, the Proposed Development is therefore not considered to result in any adverse functional impacts and instead will provide a safe new residential environment which will positively “...contribute to a socially balanced and inclusive community”.
- 6.136. With respect to environmental impact, the HPA comprises a Wind and Microclimate Assessment, Daylight, Sunlight and Overshadowing Assessment, Noise Assessment and Air Quality Assessment. These submitted technical reports demonstrate how the respective environmental considerations have informed the design of the Proposed Development and sought to minimise the potential for any adverse impacts. Where the potential for such has been identified, appropriate mitigation measures have been proposed and the Illustrative Masterplan shows how these can be planned into the Proposed Development. As such, in accordance with LP Policy D9, the tall buildings will not “...compromise comfort and the enjoyment of open spaces” or “...adversely affect street-level conditions”. This similarly satisfies the requirements of LPP2 Policy DMHB10.
- 6.137. When considered cumulatively, it is clear from the relevant submitted assessments that the Proposed Development does not give rise to any adverse visual, functional or environmental impacts. It is therefore considered to conform with LP Policy D9 and LPP2 Policy DMHB10 and be of an appropriate height and massing.

Daylight, Sunlight and Overshadowing

- 6.138. NPPF 125 c) promotes the importance of making efficient use of land and, in this context, expects local planning authorities to “...take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)”.
- 6.139. LP Policy D6 states that “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”.
- 6.140. The Mayor’s Housing SPG explains that the Building Research Establishment (“BRE”) good practice guidelines and methodology can be used to assess the levels of daylight and sunlight being achieved. However, it is clear that these “...should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan’s strategic approach to optimise housing output and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development” (paragraph 2.3.47).
- 6.141. On the basis of the above, the Mayor’s Housing SPG states that “quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London” (paragraph 2.3.47). In this respect “decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm” (paragraph 1.3.46). This guidance has been carried forward within the Draft Good Quality Homes for All Londoners Guidance (October 2020) at pages 62-63 which reinforces the importance of this flexible approach in decision-making.
- 6.142. At a local level, LPP2 Policy DMHB11 similarly states that “development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space”.

- 6.143. A Daylight, Sunlight and Overshadowing Assessment has been undertaken by eb7 and submitted as part of this HPA. This gives consideration to the levels of daylight and sunlight being achieved within the Proposed Development in the interest of the residential amenity of future occupiers as well as the impacts on sensitive neighbouring receptors to understand the potential for change as a result of the regeneration of the Estate. The external communal (private) amenity areas and public open spaces have also been assessed to understand the potential for overshadowing and ensure that the design facilitates the maximisation of the usability of these spaces in accordance with LP Policy D6.
- 6.144. Given the Proposed Development seeks to optimise the Site's potential in supporting future housing delivery and in particular the regeneration of the existing Estate, a degree of change for the surrounding built environment is inevitable. However, the approach to height and massing alongside the configuration of built form has been informed by thorough daylight, sunlight and overshadowing analysis during the pre-application stage and a result of detailed consultation with both LBH LPA Officers and the GLA. It therefore seeks to minimise the potential for adverse effects to ensure that the residual impacts and the retained levels for neighbouring properties are considered to be acceptable for an urban location. This is evident through the maximum height and building footprint parameters for the Outline Area which, as established by Parameter Plans 2 and 3, are considered to demonstrate a positive design response to the nearest residential receptors. This concentrates massing at the southern end of the Site, where the existing context is currently at its highest, and stepping down in scale within the central and northern areas of the Site, particularly along the eastern boundary to respect the lower storey residential dwellings along Little Road.
- 6.145. It is important to note that in undertaking this assessment, the Detailed First Phase and Outline Area have been considered independently. The former on the basis of the submitted detailed drawings and the latter on the basis of the maximum parameters, as established through the submitted Parameter Plans. Indicative parameters have then also been tested. These are based on the Illustrative Masterplan as a combination of the Detailed First Phase and Outline Area. Whilst the indicative parameters are largely reflective of the maximum parameters in terms of height and building footprint, there are slight variations achieved through the articulation and detailing of the buildings which reduce the bulk of built form when compared to the massing approach used in the assessment of the maximum parameters. The indicative parameters therefore provide results which are representative of the levels that would be achieved should the Proposed Development be delivered on the basis of the Illustrative Masterplan.

a) Neighbouring Residential Amenity

- 6.146. The daylight impact has been assessed on the basis of Vertical Sky Component (VSC) and No-Skyline (NSL) tests measured for all the windows and rooms of the surrounding properties which are considered sensitive receptors. This includes the neighbouring residential properties on Little Road, the 3-storey Airlink Hotel to the north of Pump Lane (18-22 Pump Lane); Crauford Business Park (comprising Unit 8 as the locally listed building); the consented Silverdale Industrial Estate scheme adjacent; the mixed-use properties to the south west of the site at 63-73 Station Road and 1A Crown Close; the Old Crown Pub (81 station road and locally listed); and, the residential apartment buildings to the south of the Grand Union Canal (Navigation, Cardinal & Vantage Building).
- 6.147. In terms of the properties on Little Road and in assessment of the Illustrative Masterplan, the VSC assessment demonstrates that 17 of the 19 properties will continue to receive good levels of daylight and meet the BRE guideline targets. However, the deviations are either marginal or affect windows which are considered already more sensitive and reliant on very low levels of daylight due to their small size and recessed positions. This condition is reinforced by the fact that levels achieved at the neighbouring properties are fully compliant.
- 6.148. The NSL analysis shows that the majority of habitable rooms will either retain daylight distribution levels in accordance with the BRE guideline targets or be subject to a negligible to minor impact from the Proposed Development. Where changes fall beyond this in the NSL these are limited to the ground level rooms of one property only which is inevitable where comprising particularly deep rooms in such an urban location and which are already constrained by overhanging built form. Based on the maximum parameters, there is no material change in terms of VSC compliance with a slight increase in NSL effects but these are limited to isolated locations where existing levels are already constrained or where levels are characteristically high in the existing scenario such that effects are exacerbated. Nonetheless, the “worst case” scenario presented through the maximum parameters is still considered to remain good for an urban location and acceptable against BRE guidelines.

- 6.149. Overall, the impacts are considered acceptable for such an urban regeneration scheme, and the sky visibility is retained in line with what would be expected within an urban context, as set out within the Mayor's Housing SPG and draft Good Quality Homes for All Londoners Guidance (October 2020).
- 6.150. The locally listed façade of the existing commercial building to the south east, known as Crauford Business Park (Unit 8) has also been assessed in light of the potential for the site to be developed for residential purposes in the future and in demonstrating compliance with LPP2 Policy DMHB11. The consented scheme at the Silverdale Industrial Estate has also been assessed to understand any potential effects for future occupiers. The Average Daylight Factor (ADF) test is considered appropriate where new development is proposed but not yet built in order to assess the on-going acceptability of daylight conditions. The ADF results demonstrate that based on the Illustrative Masterplan all but three of the spaces (within the locally listed building) meet and exceed the minimum ADF target for a habitable space, with the majority also achieving the greater requirement for a main living space or experiencing a unnoticeable tolerance from this. Two of the three spaces which fall below the target are only subject to minor deviations which would not be perceptible to any potential future occupants. The remaining one space is located at first-floor of the locally listed building. Given its position in the façade, it is considered unlikely that this window would serve primary habitable space should the building be converted for residential use in the future and any future proposals would be expected to address and plan in this space accordingly.
- 6.151. Overall it is considered that through the careful future internal design of the locally listed building, sufficient daylight levels can be achieved to ensure a good standard of residential amenity. In terms of the Silverdale Industrial Estate scheme, this will continue to enjoy adequate levels of daylight as consented and fully meet the BRE guideline targets. The assessment of the maximum parameters when compared to the Illustrative Masterplan confirm the effects would be unchanged.

- 6.152. Whilst on the whole the Old Crown Pub on Station Road is not considered to be a relevant residential receptor, there is one window at first floor level overlooking the Site which has the potential to provide ancillary accommodation / bedroom space. On the basis of the Illustrative Masterplan, there will be a marginal reduction in VSC below the recommended 0.8 times the former value, but this is only minor achieving 0.7 times the former value and therefore not considered to impact on the use of this space. In turn it will continue to achieve above 20% VSC and therefore be well in excess of the 'mid-teens' level that is considered broadly typical in urban locations. There will be little change in the NSL ensuring full compliance with the BRE guidelines. The maximum parameters results are similar in terms of the VSC when compared to the effects of the Illustrative Masterplan. Whilst there are additional effects in respect of the daylight penetration to the room, retained daylight levels remain good for an urban location.
- 6.153. In terms of the mixed-use properties to the south west of the Site at 63-73 Station Road (odds), 75 Station Road and 1A Crown Close, there are windows at first floor level and above in residential accommodation which will be impacted as result of the placement of taller elements of the Proposed Development within the southern part of the Site. The daylight results show that based on the Illustrative Masterplan, there will be minor reductions below the BRE recommendations in terms of both the VSC and NSL. However, the retained VSC levels are broadly consistent with the levels that are expected and considered acceptable in such urban locations, in line with the guidance contained within the Mayor's Housing SPG and draft Good Quality Homes for All Londoners Guidance (October 2020). In turn, the affected spaces are understood to serve less sensitive rooms such as bedrooms, non-habitable space or at worst small kitchens.
- 6.154. Non-habitable rooms are not relevant for assessment and the BRE regard bedrooms as 'less important' for daylight due to their transient use. The main living spaces of these properties are also anticipated to be located overlooking Station Road and therefore unaffected by the Proposed Development ensuring a satisfactory level of residential amenity will be retained overall.
- 6.155. As such, the Proposed Development based on the Illustrative Masterplan is not considered to significantly impact the amenity and pattern of use of these properties and are considered acceptable within their context and in line with the relevant guidance. The maximum parameters result in little difference when compared to the effects of the Illustrative Masterplan and are therefore similarly considered to be acceptable.

- 6.156. In terms of apartment buildings to the south of the Grand Union Canal, the Proposed Development based on the maximum parameters will have very little effect on both the VSC and NSL. Any slight deviations from the recommended BRE guideline targets are negligible to minor and isolated in relation to windows beneath balconies where the sky views and daylight penetration are already somewhat constrained as a result of the existing situation. Overall, the effects are therefore considered to be limited and almost all the windows would meet the targets if it were not for technical deviation caused as a result of to the placement of balconies, without which the levels of daylight and sunlight would be virtually unchanged. Therefore, it is considered to be acceptable in line with BRE guidelines. The maximum parameters do result in increased sensitivity for these apartments buildings at isolated locations when compared to the Illustrative Masterplan. This is due to these parameters being based on concentrated blocks of massing without breaks and articulation which would be provided in any scheme coming forward and, as noted above, a result of technical deviations. Overall, however, the effects would be limited to minor and considered acceptable in line with BRE guidelines.
- 6.157. In terms of the 3-storey Airlink Hotel to the north of the Detailed First Phase on Pump Lane, the assessment has identified a number of windows across the front elevation that are likely to have an open outlook across the existing Estate and based on the existing configuration benefit from good levels of daylight. As the hotel comprises a non-residential / transient use, a degree of flexibility is to be applied when considering the potential impacts against recommended BRE guideline targets.
- 6.158. The assessment demonstrates that, based on the Illustrative Masterplan, the vast majority of rooms will achieve the recommended BRE guideline VSC and NSL targets. A limited number of rooms will experience minor reductions below but these are isolated to those at ground level which serve a restaurant, café, and circulation space or two bedrooms at first and second floor which are already more sensitive as result of the windows being recessed. Therefore overall, and given the transient use of the building, the impact on amenity will be limited and it is considered that they will not materially affect the use / enjoyment of the spaces. As such the levels are considered fully acceptable in line with BRE guidelines. The Daylight and Sunlight Assessment also confirms that VSL / NSL effects will be unchanged based on the maximum parameters.

- 6.159. With respect to the effects on sunlight levels to these neighbouring properties, the BRE guidance recommends that all living rooms with windows within 90 degrees due south should be considered. The only relevant properties therefore comprise the apartment blocks to the south of the canal and the mixed used properties along Station Road and Crown Close. For the apartment blocks, all levels will remain fully compliant with BRE guidelines based on the Illustrative Masterplan and there is no material change when tested against the maximum parameters. In terms of the properties on Station Road and Crown Close, and based on the Illustrative Masterplan there will either be no change and/or the windows tested will continue to benefit from sunlight that significantly exceeds the APSH targets and therefore is fully compliant with BRE guidelines. The assessment of the maximum parameters shows little change from this and so similarly confirms there will be no adverse effect in regards to sunlight.
- 6.160. In terms of the potential overshadowing effects, the rear gardens of the Little Road properties have been assessed on the basis of the Illustrative Masterplan, given their proximity to the Proposed Development. This is using the BRE's recommended '2 hour sun contour' analysis. The results for these neighbouring gardens show that there will be no material overshadowing to these spaces where all of the gardens will continue to achieve near existing levels of sunlight and meet the BRE guideline targets. When considered in the context of the maximum parameters there is the potential for further shading effects given it is based on a cumulative massing envelope without any building articulation or breaks which would come forward as part of any future development. Nonetheless, the gardens would still all retain good levels of sunlight well in excess of the BRE targets.
- 6.161. On the basis of the submitted Daylight, Sunlight and Overshadowing Assessment as summarised above, the Proposed Development is not considered to result in any unacceptable harm on neighbouring properties and will maintain a satisfactory level of residential amenity in-keeping with its urban setting. It is also reflective of a changing context through the regeneration of the Estate to make efficient use of the land and provide replacement as well as new housing. It is therefore regarded to be wholly in accordance with NPPF 125 c), LP Policy D6, the Mayor's Housing SPG, draft Good Quality Homes for All Londoners Guidance (October 2020) and LPP2 Policy DMHB11.

b) Proposed Residential Amenity

- 6.162. In terms of the Detailed First Phase, all 80 units will receive an acceptable level of daylight and sunlight in accordance with the recommended BRE guidelines and when giving consideration to the Site's urban location. The assessment confirms that 96% of the habitable rooms will meet the relevant ADF target and therefore surpass the BRE guidance, this is noted to be an excellent level of compliance in terms of internal daylight for a large residential apartment scheme in an urban location. The deviations relate to windows located below balconies and are isolated to open plan living areas where both BRE guidance and the Mayor of London endorse a flexible approach given the multi-functional use and depth of such rooms. In turn the shortfalls are so minor they are not considered to be perceptible to the occupants and on testing the principal living space closest to the window, it will achieve the relevant ADF targets. This is based on the detailed floorplans for Blocks A and B with regard to the emerging / future context of the regenerated Estate in the form of the Illustrative Masterplan. When considered against the maximum parameters there is no material change in effect. As such, the daylight levels within the Detailed First Phase are considered to be excellent and in line with the recommendations of BRE and the Mayor of London.
- 6.163. In terms of sunlight levels for units of the Detailed First Phase, when considering the rooms within 90 degrees due south in accordance with BRE guidance, 80% fully meet the BRE criteria achieving at least 25% for total annual sunlight levels and at least 5% for the winter months. This is a high level of compliance for a flatted residential development in an urban location. These results also show that, whilst there are 13 rooms below the targets, all of these living spaces will achieve a good levels of sunlight upwards of 12% and will experience a degree of sunlight during the winter in line with the Mayor of London's recommendations in the draft Housing SPG.
- 6.164. This above is based on the detailed floorplans for Blocks A and B with regard to the emerging / future context of the regenerated Estate in the form of the Illustrative Masterplan. When considered against the maximum parameters there is no material change in effect. As such, the sunlight levels are considered to exceed that typically expected for such an urban regeneration scheme and therefore be entirely consistent with the recommendations of BRE and the Mayor of London.

- 6.165. For the Outline Area, eb7 has undertaken internal façade analysis to provide an indication of the levels of daylight that could be received by future residents of these latest phases. This exercise has been undertaken on the basis of the Illustrative Masterplan and maximum parameters. Overall the vast majority of the elevations will enjoy high levels of daylight in excess of 27% VSC with the inward facing elevations of Phases 2-4, onto the internal courtyards, being inevitably more constrained. However, where such VSC levels are below the recommended BRE guidelines these are at isolated points where it is typical for circulation space and less sensitive uses to be proposed. Therefore, through good design and careful internal residential configuration on both a floor and unit basis at the detailed design stage of future RMAs, it is considered that these shortfalls could be addressed and good daylight amenity achieved in accordance with BRE guidelines.
- 6.166. In terms of the quality of external amenity areas and public open space, a total of six areas have been assessed by eb7 to understand the potential overshadowing impacts. This is based on the Illustrative Masterplan and therefore includes the three communal (private) podium gardens; the ground floor communal (private) courtyard at the southern end of the Site; the new Community Square with its associated public realm; and, Western View. It also considers the external amenity space to include play space and public realm coming forward temporarily as part of the Detailed First Phase given this has the potential to be in place for a number of years.
- 6.167. The assessment confirms that all of the public amenity ground floor spaces will experience good levels of sunlight on 21st March and achieve well in excess of the recommended BRE guideline target of 2 hours of sunlight in relation to at least 50% of the space. In this respect, at least 87% of the public amenity ground floor spaces achieve 2 hours or more of direct sunlight on the 21st March and therefore will be sufficiently sunlit throughout the year.
- 6.168. The three communal (private) podium areas of the perimeter blocks and the ground floor communal (private) courtyard fall short of the BRE guideline target with between 32-33% of the areas receiving at least 2 hours of sunlight on the 21st March. However, the sunlight exposure analysis confirms that the majority of these spaces are only marginally below the recommended 2-hour threshold at 1.6 hours or above and therefore it is considered that this shortfall is unlikely to significantly alter the quality of the space or impact on usability by residents.

- 6.169. Consideration has also been given to the sunlight to the amenity spaces on the 21st June during the summer when the spaces are most likely to be used and the expectation of sunlight will be higher. This has confirmed that the vast majority of each space will enjoy over 2 hours of sunlight (at circa 99%). In turn, when considered comprehensively, the Proposed Development is considered to provide a range of good quality external amenity and public open spaces where over half of the total area receive 2 hours or more direct sunlight on 21st March with 74% of the spaces (to include podium areas) achieving the BRE target levels. This is in addition to sufficient levels of sunlight at appropriate times in the year, in particular in the summer, to ensure they are useable and meaningful. This therefore represents a marked improvement on the limited provision within the existing Estate and will not only serve residents but members of the wider community also.
- 6.170. In terms of the maximum parameters, the sunlight assessment on the amenity spaces demonstrates that sufficient levels could be achieved through further refinement as part of the future RMAs for the Outline Area.
- 6.171. On the basis of the above and the submitted Daylight, Sunlight and Overshadowing Assessment, the Proposed Development will provide sufficient daylight and sunlight for future residents and through careful design will minimise the impacts of overshadowing so that the usability of external amenity and public open spaces can be maximised at the most appropriate times of the year. It is therefore regarded to be wholly in accordance with NPPF 125 c), LP Policy D6, the Mayor's Housing SPG, draft Good Quality Homes for All Londoners Guidance (October 2020) and LPP2 Policy DMHB11.

Inclusive Design

- 6.172. NPPF 130 f) states that planning policies and decisions should ensure that developments “*create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience*”.
- 6.173. In this regard, LP Policy D5 expects development proposals to achieve the highest standards of accessible and inclusive design and provides a set of criteria that should be satisfied. This includes ensuring there are disabling barriers and that access can be gained independently without undue effort, separation or special treatment.

- 6.174. LPP2 Policy DMHB12 further reinforces the above, requiring development to be well integrated with the surrounding area and accessible. This should incorporate the principles of inclusive design.
- 6.175. The submitted Design and Access Statement, contains an Inclusive Design Strategy as required by LP Policy D5. This is supported by the design principles that underpin the regeneration of the Estate as a whole and therefore have been applied to the Detailed First Phase and will be expected to be applied to the Outline Area through future RMAs. The Illustrative Masterplan demonstrates one way in which the inclusive design principles could be incorporated on this basis and it is evident from this that they are central to the Proposed Development, extending to all parts of the public realm and built form. This takes account of level changes across the Site to ensure independent and easy horizontal and vertical movement into and through buildings; out onto private and communal (private) amenity spaces; to car parking provision; and, across public open spaces and public realm.
- 6.176. A key public realm improvement of the Proposed Development is the opening up and enhancement of Western View and the frontage onto the Grand Union Canal via Silverdale Drive. As part of this and in conjunction with the development coming forward on the neighbouring Silverdale Industrial Site to the east, the accessibility of Western View will be increased.
- 6.177. Across the two sites, this will include three sets of stairs and an accessible lift, all publically available to ensure inclusive access for all. In accordance with the policy requirements of Site Allocation SA23, this will *"...ensure canal-side access and promote canal-side activity to maximise recreational potential"*. In addition, the proposed accesses within the Site will sit on new and improved pedestrian and cycle links which will run through the Estate to the existing network of the wider area, resulting in greater permeability overall. It will therefore provide *"...improved connectivity between Silverdale Road, Western View, Austin Road and Hayes Town Centre"* as sought by Site Allocation SA23. Parameter Plan 4 establishes these key routes within the Outline Area and the Illustrative Masterplan shows one way in which these could be delivered, tying in the Detailed First Phase also.
- 6.178. On the basis of the above, and as demonstrated through the Illustrative Masterplan, the design principles are underpinned by an inclusive design rationale and will therefore ensure that the Proposed Development is well integrated and accessible for all. This is wholly compliant with LP Policy D5, LPP5 DHMB12 and Site Allocation SA23.

Private Amenity and Playspace

- 6.179. In encouraging the delivery of housing development of a high quality, LP Policy D6 establishes minimum standards for the provision of private outside space that should be applied across all residential tenures and forms of accommodation. It states that *“where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.”* The supporting text is clear that such provision *“...should be practical in terms of its shape and utility, and care should be taken to ensure the space offers good amenity”*. It is expected that all dwellings will be provided with level access to one or more form of private outside space, to include a garden, terrace, roof garden, courtyard garden or balcony. It goes on to state that *“the use of roof areas, including podiums, and courtyards for additional private or shared outside space is encouraged”* (paragraph 3.6.9).
- 6.180. In terms of communal (private) outside amenity space, LP Table 3.2 sets out the qualitative design aspects that should be addressed in housing developments. This sets out how such provision should provide sufficient space to meet the number of residents; be easily accessible; be located so that it can be appreciated from the inside; allow overlooking; and, be designed to encourage a balance of informal social activity and play opportunities for a range of age groups.
- 6.181. LP Policy S4 expects development proposals to *“increase opportunities for play and informal recreation and enable children and young people to be independently mobile”*. At least 10 square metres should therefore be provided per child and be designed to satisfy the criteria set out under this policy. It includes providing a stimulating environment; facilitating safe and independent access; forming an integral part of the surrounding neighbourhood; incorporating greening; be tenure-blind; and, be overlooked to ensure passive surveillance. Large-scale public realm developments are encouraged to *“incorporate incidental play space to make the space more playable”*.

- 6.182. The supporting text is clear that, in line with the above, there should be appropriate provision for different age groups and that this “...*should normally be made on-site...*” (paragraphs 5.4.4 and 5.4.5). However, it is recognised that “*off-site provision, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents*” (paragraph 5.4.6). In particular, this is considered to be more appropriate in terms of providing suitable play facilities for older children. The Mayor’s Play and Informal Recreation SPG provides further guidance on the benchmarks that should be applied to the provision of play space giving regard to existing provision, distance and accessibility from homes and the specific needs of differing age groups. It also provides guidance on the GLA’s Playspace Calculator which should be used to determine the quantum of playspace to be provided based on child occupancy.
- 6.183. At a local level, LPP2 Policy DMHB18 requires all new residential development to “...*provide good quality and useable private outdoor amenity space...*” and states that this should be in accordance with the standards set out in Table 5.3 which provides a minimum square metre requirements based on unit type. These minimum standards significantly exceed those set out under LP Policy D6 on the basis LBH LPA “*considers higher standards of private amenity space should be possible in the Borough...*” (paragraph 5.69). However, similar to LP Policy D6, it is stated that “*balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres*”.
- 6.184. LPP2 Policy DMHB19 relates specifically to play space and states that “*new major residential developments which result in an occupancy of ten or more children will be required to provide children and young people’s play facilities on-site. 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.*” The supporting text confirms this should be calculated in the Mayor’s Play and Informal Recreation SPG (paragraph 5.76).

6.185. The Options Appraisal (October 2020), prepared by Savills in support of the Case for Regeneration (as discussed further in Section 3) states *“from a resident perspective a key finding from the recent engagement exercise, in relation to quality of existing homes, was a lack of private amenity space. 81 of the 171 households (47% of respondents) who responded to the consultation do not have access to a private garden or balcony. In addition, of those responding that do have access to private amenity space, 16 households (18% of respondents) do not make use of their garden or balcony, commenting that it is not private or large enough, or they have safety concerns related to ASB and crime or condition.”* The regeneration of the Estate through the Proposed Development therefore provides an opportunity to address the existing deficiency on-site and ensure all future residents, to include returning and new, benefit from good quality space which is safe, attractive to use and easily accessible in line with up to date standards and policy requirements.

Illustrative Masterplan

6.186. As set out in detail in the submitted Design and Access Statement and Illustrative Landscape Strategy, all residential units will be served by private external amenity space that meets the minimum standards set out under LP Policy D6, based on unit type and the number of occupants. This will take the form of front and rear gardens as well as terraces for ground floor, podium level and second floor units plus the houses.

6.187. The ground floor front gardens will be set back off adjacent primary and secondary vehicular routes, via a 2.5 - 3 metre wide corridor of defensible space to ensure adequate privacy and usability. This will comprise high quality landscaping to include new tree planting and rain gardens as well as the private gardens located at ground floor and physical screening. Private balconies will be provided for units on the upper floors of the residential blocks and in accordance with LPP2 Policy DHMB18 and LP Policy D6 will be of a depth of not less than 1.5 metres and a width of not less than 2 metres.

6.188. The proposed provision, which equates to 5,320.5 square metres, is shown indicatively through the Illustrative Masterplan on the basis of the indicative unit mix and therefore is representative of the maximum provision that could come forward through the outline parameters plus fixed provision for the Detailed First Phase, as assessed further below. For the Outline Area, the future RMAs will therefore determine the exact quantum that is required based on the final unit mix per zone and/or phase.

- 6.189. Whilst the proposed private amenity space provision does not meet the minimum standards set out under LPP2 Policy DHMB18, these standards are considered to be particularly onerous and in such urban locations would have a detrimental impact on the ability to make efficient use of the land. NPPF 125 is clear that “...*planning policies and decision should avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site*”. It goes on to state that proposals that fail to make the efficient use of land should be refused.
- 6.190. The rationale for the provision of private amenity space as part of the Proposed Development is therefore considered entirely appropriate given it accords with the minimum standards set out under LP Policy D6 and in the context of the regeneration of an existing Estate within an urban setting, will provide a marked improvement in residential amenity for returning residents, a number of which do not currently have any private outdoor space as well as facilitate an equivalent level of good quality amenity for additional new residents. It will be of sufficient size to ensure it is useable and carefully configured to provide adequate privacy and thereby address issues raised by existing residents which inhibits the use of any space, albeit limited, currently on the Site. This contributes to an increase in both quantum and quality across the standard of residential accommodation within the borough as a whole.
- 6.191. In addition to the provision of private external amenity space per unit all residents will also have access to communal (private) amenity space. A total of 1,950 square metres of communal (private) amenity space is proposed estate-wide, as shown on the Illustrative Masterplan. This comprises podium gardens and dedicated ground floor courtyards configured between blocks as part of the Development Zones. These spaces will incorporate a combination of quiet areas for recreational activity, seating and resident gathering, the potential for community growing and also play. In accordance with the qualitative design requirements set out under LP Table 3.2, the communal external provision will therefore be multi-functional to encourage a balance of activities that meet the differing needs of residents and the internalised location of these spaces between residential blocks will ensure they benefit from overlooking in the interest of maximising safety and usability.
- 6.192. In terms of playspace, a total of 2,111 square metres of children’s play space is proposed Estate-wide. This comprises 1,227 square metres of play for children aged 0-4 years; and, 884 square metres for children aged 5-11 years, as set out in Table 11 of Section 4.

- 6.193. Further detail on the strategy including the on-site typologies per age group and distribution of these across the Estate, is set out within the submitted Illustrative Landscape Strategy. The structure, form and final size of each of the areas of play space will be determined through the detailed design development of the Outline Area as part of future RMAs.
- 6.194. Whilst based on the Illustrative Masterplan and therefore cumulative indicative unit mix, there is a shortfall in provision across all age groups when considered against the 10 square metre per child policy requirement based on the GLA's Playspace Calculator (as evident from Table 11 in Section 4). However, this shortfall primarily relates to the older age groups, particularly 12+ years old. It is considered that this represents the optimal quantum for the Site given its existing constraints, urban context and its role as an identified estate for regeneration to provide much needed replacement and additional new homes which overall will result in a higher standard of residential accommodation.
- 6.195. The Mayor's Play and Informal Recreation SPG emphasises that it is provision for under 5's that should be provided on-site close to home, within a maximum of 100m walking distance from a residential unit, and in the form of doorstep playable space, (Tables 4.4, Tables 4.5 and 4.7 of the SPG). As evident from the above, the Proposed Development has sought to prioritise this and achieves a high standard of provision in both qualitative and quantitative terms through doorstep play within the communal podium garden plus informal "play-on-the way" provision distributed throughout the adjoining green streets. This is in addition to provision within private external amenity space serving individual units.
- 6.196. In terms of provision for 5-11 year olds, Table 4.4 of the GLA's SPG states this should be within a maximum 400m walking distance from residential units. Where there is existing provision within 400m, Table 4.5 explains that provision to meet the needs of new development should be made on-site or off-site via a financial contribution to ensure overall those needs can be met. The Proposed Development will provide 1,063 square metres of local playable space on the Site within the public realm and areas of public open spaces, to include the Community Square. This will be supplemented by existing off-site facilities located at Botwell Green Sports and Leisure Centre, which sits within a 400m walking distance, as well as more informal intergenerational play space provided on-site for all ages.

- 6.197. For older children (12+ years), Table 4.4 of the SPG states that the playspace should be within a maximum 800m walking distance from residential units. Where there is existing provision within 800m, Table 4.5 explains that provision to meet the needs of the development should be made on-site or off-site via a financial contribution to ensure overall those needs can be met. Botwell Green Sports and Leisure Centre to the north (within 400m walking distance) and Lake Farm County Park to the west (within 800m walking distance) provide facilities for older children and comprise adequate provision to meet the demand generated from the Proposed Development. This approach is considered wholly appropriate in accordance with LP S4 and the acknowledgement at supporting paragraph 5.4.6 that such off-site provision is likely to be more appropriate for older children, who can travel to access it. It goes on to confirm that off-site provision is often better suited in order to meet the specific play, social and recreational needs of this age group which is unlikely to be able to be wholly satisfied through provision on-site.
- 6.198. In summary, the proposed provision and strategy for private external amenity space, communal (private) external amenity space and playspace as part of the Proposed Development is considered to meet the needs of returning and new residents. In accordance with LP Policies D6 and S4, the Mayor's Play and Informal Recreation SPG, LPP2 Policies DMHB18 and DMHB19, it will be of good quality; stimulating through the incorporation of a range of hard and soft landscaping, play and recreational features; and, located so that it benefits from passive surveillance. It will therefore be safe, meaningful and useable. All spaces will be accessible, underpinned by the inclusive design principles, and of an equivalent standard across the Estate to ensure no differentiation between tenures. It is therefore considered to represent a substantial improvement on the existing provision.

Detailed First Phase

- 6.199. Consistent with the Illustrative Masterplan, all 80 residential units within the Detailed First Phase will benefit from private external amenity space that meets the minimum standards set out under LP Policy D6, based on unit type and the number of occupants. This will take the form of 156 square metres of front gardens as well as 174 square metres of rear and roof terraces for those units at first floor podium level and second floor roof level.

- 6.200. 490 square metres will be provided as private balconies for all units on the upper floors of the residential blocks. In accordance with LPP2 Policy DHMB18 and LP Policy D6 these will be of a depth of not less than 1.5 metres and a width of not less than 2 metres. In addition, 278 square metres of communal (private) external amenity space will be provided at first floor podium level in the form of a garden and will be accessible by all residents of Blocks A and B.
- 6.201. The ground floor private front gardens will be set back off the adjacent primary and secondary vehicular routes, via a 2.5 – 3 metre wide corridor of defensible space to ensure adequate privacy and usability. This will comprise high quality landscaping to include new tree planting and rain gardens as well as the private gardens located at ground floor and physical screening. Similarly, defensible space in the form of landscaped borders will sit between the private rear terraces at podium level and the adjacent communal (private) podium garden to provide visual, physical and acoustic separation. This will clearly define the private and semi-private areas in the interest of safeguarding residential privacy and ensuring the use of both of these spaces can be maximised as intended.
- 6.202. In terms of play space, it is intended that the Detailed First Phase will be served by the estate-wide provision over the longer-term and in meeting the needs of differing age groups as part of the Proposed Development as a whole. Nonetheless, 128 square metres of accessible doorstep play will be incorporated within the communal podium garden that sits between Blocks A and B to serve the under 5's of these two blocks. This is in addition to the informal "play-on-the way" provision that will be distributed throughout the green playable streets that border the blocks to the east, south and west. Residents will also have the added benefit of provision within their dedicated private residential amenity space.
- 6.203. The permanent provision within the Detailed First Phase will also be supplemented, temporarily, by up to 248 square metres of play space for 0-11 year olds as part of the temporary works within the Detailed First Phase. It will provide additional play and recreation space whilst and until the later phases of the Proposed Development and remaining play space to serve a range of ages more widely, comes forward. This is in addition to the existing off-site facilities to include Botwell Green Sports and Leisure Centre to the north (within 400m walking) and Lake Farm County Park to the west (within 800m walking) which as part of the estate-wide play space strategy represent provision that will be available and accessible to meet the needs of the 5-11 year olds and 12+ years olds from first occupation.

6.204. On the basis of the above, the Detailed First Phase is considered to comprise provision that will sufficiently serve the needs of returning and new residents up front as part of the longer-term comprehensive regeneration of the Estate. This includes permanent provision that will ensure residents have access to a policy compliant level of private external amenity space (LP Policy D6) plus communal (private) external amenity space and play space from the beginning. This will be complemented by additional play and recreation space temporarily and which will further contribute to meeting the short-term needs of the Detailed First Phase residents. As part of the estate-wide strategy and in conformity with the design principles that underpin the Proposed Development as a whole, it is considered that this element is wholly appropriate and acceptable in accordance with LP Policies D6 and S4, the Mayor's Play and Informal Recreation SPG, LPP2 Policies DMHB18 and DMHB19.

Public Open Space and Landscaping

6.205. In promoting the creation of healthy and safe communities, NPPF 92 encourages planning policies and decisions to support developments that provide "*...opportunities for meetings between people who might not otherwise come into contact with each other...*" and the creation of a strong neighbourhood centre is noted as a way of achieving this. It goes on to explain the importance of high quality public space in encouraging active and continual use of public areas (NPPF 92 b)).

6.206. NPPF 98 highlights how access to a network of high quality open spaces and opportunities for sport and physical activity positively contributes to the health and well-being of communities, and can deliver wider benefits for nature as well as towards addressing climate change. NPPF 130 b) identifies the role of effective landscaping in ensuring that developments are visually attractive.

6.207. LP Policy D8 relates to public realm and highlights the role of this in creating an environment that is easy to understand, facilitates movement, incorporates green infrastructure, and is supportive of the built form in contributing to the sense of place. As part of this, LP Policy G1 is clear that "*green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits*". There is an expectation that development proposals where possible should create areas of publicly accessible open space, particularly in areas of deficiency, as a vital component of London's Infrastructure (LP Policy G4).

- 6.208. The above goes hand in hand with LP Policy G5 and the requirement for major development proposals to “...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”. It goes on to outline that, for predominantly residential development, the amount of urban greening should be considered against the Mayor’s recommended target of 0.4 to ensure an appropriate provision.
- 6.209. At a local level, LPP2 Policy DMHB12 relates specifically to streets and public realm, expecting new development to be well integrated with the surrounding area and accessible. The design of public realm should take “...account of the established townscape character and quality of the surrounding area” and “include landscaping treatment that is suitable for the location, serves a purpose, contributes to local green infrastructure, the appearance of the area and ease of movement through the space”. Where developments are located close to transport interchanges and community facilities, it outlines that public realm improvements will be sought to ensure easy access.
- 6.210. LPP2 Policy DMHB14 expects all development to retain or enhance existing landscaping and, as part of the strategy for the site, should provide appropriate hard and soft landscaping and amenity particularly in areas deficient in green infrastructure. As part of this, LPP2 Policy DMEI1 requires all major development to incorporate living roofs and/or walls into the development.
- 6.211. The extent of existing public open space and landscaping on the Site is limited. Whilst there is an equipped play area and some semi-private amenity areas, the majority of this comprises hard landscaping; “empty” or “left over” spaces between residential blocks and surrounding the car parking areas which act as external circulation and access; walkways; roads; verges; the occasional planters and a strip of green space that extends along the rear of the residential units that adjoin the western boundary but is not publically accessible, secured via locked gates and boundary planting. The usability and functional capacity of the existing provision on the Estate is therefore poor and not clearly defined. The Proposed Development, to include the comprehensive regeneration of the Estate therefore provides an opportunity to correct this and introduce greening to the Site so that it can contribute to the wider borough and London network.

Illustrative Masterplan

6.212. The submitted Design and Access Statement and Illustrative Landscape Strategy provide full details on the proposed approach to the delivery of public open space and landscaping on the Site. It is integral part of the Proposed Development, as can be seen from the Illustrative Masterplan and on the basis of the design principles which will guide all future development. The objectives are as follows:

- Support improved pedestrian and cycle connectivity, and permeability;
- Create a new public Community Square, with space to relax, meet and play;
- Generate green living streets that complement the active frontage delivered by the architectural scheme;
- Provide clear definition between public and private space;
- Maximise opportunities for greening at all levels of the development, as well as vertically and horizontally, to include the incorporation of biodiverse roofs;
- Achieve ecological enhancements by creating a “green basin” for wildlife connecting the Proposed Development with the existing green and blue infrastructure network of the strategic canal corridor to the south;
- Manage surface water sustainably, and use Sustainable Drainage Systems (“SuDS”) features within the streets to promote the physical connection with the Grand Union Canal;
- Provide local playable space within the Community Square, and informal “play-on-the-way” opportunities throughout the green streets and connecting spaces; and
- Be mindful of safety and security.

6.213. For the Outline Area, Parameter Plan 5 establishes the extent and distribution of open space, public realm, amenity space and landscaping in the context of the Development Zones. The Illustrative Masterplan then shows how this could be delivered across the Estate, to include the Detailed First Phase, as considered further below. On this basis, a total of 4,803 square metres of public open space, public realm and landscaping is proposed estate-wide. This equates to 19% of the Site and comprises a Community Square, pedestrianised streets, canal side public realm improvements and other landscaped areas within the streetscene.

- 6.214. The Community Square will provide a new high quality public open space of 842 square metres at the heart of the regenerated Estate as sought by the policy requirements of Site Allocation SA23. It forms the central component of the wider place-making strategy, strategically located at the meeting point of new and enhanced north-south and east-west movement routes through the Site. This includes joining of the re-aligned Austin Road with an enhanced Silverdale Road which extends south to the canal frontage as the primary vehicular corridor as well as new pedestrian and cycle connections between the High Street to the west and existing (and developing) residential area to the east. Together with the proposed lighting and landscaping strategy as well as careful placement of new built footprint, these new routes through the Sites will be clearly defined within living green streets, be well-lit and benefit from natural surveillance to therefore facilitate activity throughout the day. This will bring back into use existing underutilised access points on the Site's edges to effectively integrate the Estate into the wider network.
- 6.215. In addition, the placement of the Community Square positively responds to the location of the replacement community centre within Development Zone 4 which, through the outline parameters, has been designed to provide an active frontage on this new area of public open space. In accordance with LP Policy D8, the interrelationship between the two spaces will enhance their respective amenity and function and therefore contribute to the creation of a vibrant public realm. As a result, the Community Square will form a "*strong neighbourhood centre*" in accordance with NPPF 92 and its extending elements of public realm will ease movement through a series of connected spaces in accordance with LPP2 Policy DMHB12 so that it not only serves returning and new residents to the Estate but is also opened up to the wider local community.
- 6.216. The other key element of the estate-wide strategy is the canal side public realm improvements which propose the provision of high quality new hard and soft landscaping features at the southern end of the Site to successfully integrate with and enhance the existing canal frontage. The proposed improvements comprise:
- A new stepped access from Silverdale Road, as a continuation of the primary north-south movement route through the Site to provide improved connectivity and complement the stairs and publically accessible lift coming forward as part of the adjacent development site;

- Extensive planting and the creation of new habitat areas to provide wider biodiversity enhancements as part of the Blue Ribbon Network;
- Re-surfacing of the existing walkway along Western View and greening of the edges as an extension of the proposed improvements within the adjacent development site;
- Creation of a strong frontage onto the Canal through the placement of new built form which will provide activity and passive surveillance;
- Opening up of the Site through physical and visual gaps between built form to improve the connection and contribute to the sense of place; and
- Introduction of street furniture as well as playable features to facilitate informal social interaction and community cohesion.

6.217. On the basis of the above, and in accordance with Site Allocation SA23 the Proposed Development will *“promote canal-side activity to maximise recreational potential”*.

6.218. In terms of the landscaping of the Estate and in seeking to provide a significant uplift in urban greening, the illustrative strategy sets out a number of guiding principles and measures to be applied to the Outline Area (and in consistency have equally been applied to the Detailed First Phase). This includes a comprehensive tree planting strategy using a mix of native and non-native species; plant palettes and mixes that have a high proportion of species (>50%) of known wildlife value, including those identified by the Royal Horticultural Society as ‘Plants for Pollinators’; façade greening, using climbing plants; biodiverse extensive green roofs; and creation of varied habitat areas to include features such as bird and bat boxes as well as insect hotels. This has informed the Urban Greening Factor of the Site, which should be considered on an Estate-wide basis, and as demonstrated through the Illustrative Masterplan, achieves 0.34 against the Mayor’s recommended 0.4 target score. Whilst this falls marginally short of the LP target, it is important to note that this is only a “target” and as evident from the Proposed Development, the green infrastructure elements have been maximised insofar as is possible and provides significant improvement on the current Site conditions.

6.219. Overall, the public realm improvements proposed throughout the Site, as well as the creation of new areas of public open space and incorporation of extensive new landscaping will deliver a substantial improvement in both qualitative and quantitative terms when compared to the existing provision on the Site. The Proposed Development introduces clearly defined, usable and attractive, publically accessible green spaces and features where there is currently a notable deficiency and therefore is considered to address the requirements of NPPF 92, NPPF 98, LP Policies D8, G1, G4 and G5 and LPP2 Policies DMHB12, DMHB14 and DMEI1.

Detailed First Phase

6.220. The Detailed First Phase comprises 445 square metres of new public realm and extensive landscaping, along the perimeters of Blocks A and B. In line with the overarching principles of the Estate as a whole, this takes the form of new tree planting, mixed species habitat borders and buffer planting, integrated rain gardens and pedestrian walkways within a “green living street”. It will provide a soft edge to the built form as well as the greening of the key frontages onto Pump Lane, the re-aligned Austin Road, Crown Close and the internal estate road.

6.221. Enclosed within Blocks A and B is 278 square metres of communal (private) podium garden which will comprise a combination of hard and soft landscaping, street furniture, areas for food growing and playable features to facilitate a range of activities to meet the needs of residents of all age groups. As part of this, new habitat areas will be created to encourage wildlife and this will include an insect hotel. At roof level biodiverse green roofs are proposed across both blocks and, therefore, in combination, the various elements of the Detailed First Phase will make a meaningful and early contribution to the enhancement of the biodiversity value of the Site.

6.222. In addition, 675 square metres of temporary landscaping and public realm will be provided as part of the Detailed First Phase. This will include playable space and assist in meeting the needs of residents within Blocks A and B in the short-term and provide an attractive and landscaped residential environment whilst the remainder of the Estate and associated green infrastructure is being developed.

6.223. The public realm and landscaping strategy for the Detailed First Phase is therefore considered to be fully compliant with LP Policies D8, G1, G4 and G5 and LPP2 Policies DMHB12, DMHB14 and DME11. It will contribute to the achievement of a high standard of residential amenity, provide added environmental value and maximise the early opportunities for urban greening as part of the regeneration of the Estate.

Trees

6.224. NPPF 131 outlines the important contribution of trees to the character and quality of urban environments. In this respect, it states that *“planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments, ... and that existing trees are retained wherever possible”*.

6.225. LP Policy G7 promotes the protection, maintenance and planting of new trees in appropriate locations in order to increase the extent of London that benefits from tree coverage. As such, development proposals are expected, wherever possible, to retain existing trees of value. Where the removal of trees is necessary, the policy is clear that there should be adequate replacement based on the existing value alongside the planting of additional new trees.

6.226. LPP2 Policy DMHB14 aligns with the above, and sets out how *“all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit”*. Planning applications for proposals that affect existing trees are required to provide an accurate tree survey which outlines the provision on the site and where trees are proposed for removal, proposals are expected to provide replacement provision.

6.227. In accordance with LPP2 Policy DMHB14, an Arboricultural Impact Assessment, including an accurate tree survey has been submitted as part of this HPA. It provides details on the location, height, spread and species of all trees and related arboricultural features relevant to the Site. In total, there are 43 individual trees, four groups of trees and three hedgerows within the Site and immediately outside, along the boundaries. This existing provision has informed the design of the Proposed Development by identifying opportunities and constraints which the layout, configuration and greening of the redevelopment of the Estate must have regard to.

Illustrative Masterplan

6.228. In order to facilitate the regeneration of the Estate, on the basis of the Illustrative Masterplan, 34 individual trees, three groups of trees and two hedgerows will need to be removed. A total of nine individual trees, one group of trees and one hedgerow can however be retained and can be incorporated into the Proposed Development as part of a comprehensive network of new and enhanced green infrastructure, as shown estate-wide through the Illustrative Landscaping Strategy. Table 27 below provides clarity on the categorisation of the existing arboriculture features (to include individual trees, groups of trees and hedgerows) and identifies the proposed status of these on the basis of the Illustrative Masterplan.

Table 27: Existing Arboriculture Features for Removal and Retention

Category	Existing Number	Number for Removal	Number for Retention
Category A	-	-	-
Category B	24	16	8
Category C	24	21	3
Category U	2	2	0

6.229. As is evident from the above, the Site is not considered to contain any high quality tree cover but does comprise a wide variety of species which are of moderate quality. Where possible, the Proposed Development has sought to retain category B trees as a priority. However, the loss of tree cover centrally within the Site is necessary and inevitable in order to facilitate the regeneration of the Estate and make efficient use of the land. This has been accepted and acknowledged by LBH LPA and GLA Officers as part of the pre-application consultation process.

6.230. There are number of trees that have been identified to be of most importance on the basis that they provide visual amenity as well as a notable contribution to the public realm as part of the urban environment. These have been identified in discussion with LBH LPA's Landscape Officer and all sit within the Outline Area of the HPA. They include the row of trees located adjacent to the locally listed building, two trees within the existing area of public realm (to become the new Community Square), and the group of trees situated in the south western corner of the Site, comprising three mature silver maple trees.

- 6.231. The maximum parameters which will guide future development within the Outline Area have therefore been established to enable the retention of the existing trees and features identified to be of most importance, as summarised above. This includes the configuration of the Development Zones and defined outer building footprints as shown on Parameter Plan 2. Beyond this, the detailed design development that takes place in support of future RMAs will determine the exact number and location of features for removal and retention. The Illustrative Masterplan and submitted Illustrative Landscaping Strategy demonstrate the extent of tree removal that would be required based on one way in which the outline parameters could be applied. In this case, the removal of some of the lesser value features within the group of trees in the south western corner of the Site would be necessary. Whilst the trees identified to be of most importance that sit within this group could be retained it is considered that they would suffer as a result of some removal within this area and that the remaining space is unlikely to be meaningful or usable. Therefore, as discussed with LBH LPA's Landscape Officer during the pre-application process, it is understood that the removal of these trees and full mitigation through the provision of high-quality tree planting elsewhere within the Site is likely to be preferable.
- 6.232. There are also a number of existing conifer trees located on the eastern boundary. Whilst these are of low value as category C trees and of limited quality and significance, with many of the trees either in declining condition or having recently died, it is recognised that they may provide some amenity value by way of natural screening to neighbouring properties on Little Road. Nonetheless, they do represent a significant constraint to the redevelopment of the Site, in particular the layout of built form within Development Zone 5. The Illustrative Masterplan shows how built form could be configured within this zone in the interest of retaining these trees and ensuring that development does not encourage upon the Root Protection Zones. However, pre-application discussions with LBH LPA's Landscape Officer confirmed that the pruning required to the canopy of these trees in order to protect the residential amenity of future residents would ultimately mean the trees would suffer and decline in condition. Therefore, it is considered preferable that these trees which are of low value in any event are removed and high quality boundary treatment, to include replacement planting, provided as compensation as part of the Proposed Development.
- 6.233. The Illustrative Landscaping Strategy comprises a comprehensive approach to new and replacement tree planting strategy to ensure a net gain in the number of features on the Site. The selection of trees and planting has been specifically derived to ensure short-term and longer-term presence and on the basis of

function and usage within specific locations across the Estate. This will ensure an appropriate diversity of arboriculture features which will not only contribute to the greening of this urban site but also assist in the permeability and legibility of the Proposed Development, provide elements of visual and physical interest to include wider biodiversity benefits and, through canopy cover, allow for shading / cooling in the summer. It also provides further softening of the urban environment as well as an additional means of absorbing carbon dioxide, contributing to the wider sustainability and environmental objectives of the Proposed Development.

- 6.234. On balance, it is therefore considered that the proposed tree retention, removal and replacement strategy for the Site as part of the wider Illustrative Landscaping Strategy is policy compliant having regard to NPPF 131, LP Policy G7 and LPP2 DMHB14.

Detailed First Phase

- 6.235. Eight individual trees, one group of trees and a single hedgerow will need to be removed to accommodate the Proposed Development of the Detailed First Phase. However, 26 new trees are proposed to be planted which represents an increase in arboricultural features of 160% within the Detailed First Phase.
- 6.236. As discussed with LBH LPA's Landscape Officer during the pre-application consultation process there are a limited number of existing trees along the northern boundary of the Site. However, these have been identified to be of moderate to low retention value and therefore, the Proposed Development provides an opportunity to remove these and replace with new trees and supplementary planting of better quality. This will positively contribute to the Site's contribution to the greening of Pump Lane which is otherwise primarily a hard landscaped built environment.
- 6.237. Overall, the proposed tree retention, removal and replacement strategy for the Detailed First Phase is considered to be wholly appropriate, it will bring forward early greening of the Site as part of the longer-term regeneration of the Estate and represent a notable improvement when compared to the existing position. Therefore, it is considered to conform with NPPF 131, LP Policy G7 and LPP2 DMHB14.

Ecology and Biodiversity

- 6.238. At a national level, the importance of improving biodiversity through the planning system and development is recognised as part of the wider environmental objective of achieving sustainable development. NPPF 8 is clear that opportunities should be taken to secure net gains. In this respect, planning policies and decisions are expected to contribute to and enhance the natural and local environment, this includes protecting and enhancing valued landscapes and site of biodiversity as well as *“minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”* (NPPF 174).
- 6.239. NPPF 180 sets out guiding principles that should be applied to the determination of planning applications. These reinforce the primary objective, to conserve and enhance biodiversity and be integrated through design where there are opportunities to *“...secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate”*.
- 6.240. LP Policy G6 relates specifically to biodiversity and access to nature, seeking to protect and, where possible, enhance sites and habitats of biodiversity value. For development proposals, the impacts on biodiversity should be managed with the aim of securing net biodiversity gain. It states that *“proposals which reduce deficiencies in access to nature should be considered positively”*.
- 6.241. At a local level, LPP2 Policy DMHB14 expects landscape scheme for development proposals to *“...support and enhance biodiversity and amenity particularly in areas deficient in green infrastructure”*. On this basis, LPP2 Policy DME17 is clear that *“the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site”*. Where there is unavoidable loss, replacement features of equivalent biodiversity value should be provided on-site. For development proposal alongside or fronting a river or the Grand Union Canal, contributions towards additional biodiversity improvements will be expected and this has similarly been reflected in Site Allocation SA23 as part of the enhancement of the Strategic Canal Corridor and Blue Ribbon Network more generally.

- 6.242. A Preliminary Ecological Appraisal (PEA) has been undertaken and submitted as part of this HPA. This confirms that there are no overriding ecological constraints to the Proposed Development and is accompanied by a Biodiversity Impact Assessment which includes a Biodiversity Net Gain (BNG) calculation. This demonstrates the significant enhancements that the Proposed Development and comprehensive regeneration of the Estate will bring to the Site and wider biodiversity network in line with the expectations of national, regional and local planning policy.
- 6.243. There are no statutory designations of national or international importance within the boundary of the Site or within 2km of the Site boundary; nor, are there any statutory designations of international importance within 5km of the Site boundary. A number of Sites of Importance for Nature Conservation have been identified within 2km of the Site boundary with the most notable being the Grand Union Canal to the south as part of London's Canal's Site of Metropolitan Importance.
- 6.244. The PEA has confirmed that whilst there is a small increase in population anticipated to be generated from the Proposed Development when compared to the current baseline position, the extensive green infrastructure, public open space and public realm coming forward as part of the Proposed Development, means that there will be no significant increase on recreational pressures on any of the nearby SINCS. In terms of the Grand Union Canal specifically, the PEA identifies the potential for impacts from construction in terms of dust deposition and water pollution due to the proximity to the Site. However, through best practice measures used during the demolition and construction phases, it is concluded that any such impacts can be appropriately mitigated. The recommendations of the PEA have informed the submitted Illustrative Demolition and Phasing Strategy (including Demolition and Construction Method Statement) and the Outline Construction Logistics Plan and on this basis the Proposed Development will not result in any loss or damage to the Canal SINC.
- 6.245. The existing habitats on the Site have been identified to comprise common and widespread habitats to include areas of hardstanding, buildings, amenity grassland, introduced shrub, species-poor hedges and scattered trees. They are considered to have negligible to low potential to support commuting, foraging and roosting bats; and, nesting birds on the Site. In addition, three invasive non-native plant species have been confirmed as present on the Site.

- 6.246. No further surveys were considered necessary in relation to the low potential for nesting birds on the Site given this can be appropriately managed and any active nests protected through best practice measures during the demolition and construction phases. This has informed the submitted Illustrative Demolition and Phasing Strategy (including Demolition and Construction Method Statement) and the Outline Construction Logistics Plan which identify suitable measures that will be implemented on site to ensure no harm. Similarly, no further surveys were considered necessary in relation to the identified invasive non-native species but mitigation measures are proposed to ensure there is no further spread of these.
- 6.247. In terms of commuting and foraging bats, these are considered to be predominantly within the Zone of Influence, primarily the Canal to the south of the Site, rather than the Site itself. Albeit the potential for such is considered to be low and subject to a level of disturbance from existing uses. Given this is off-site, no further surveys were considered necessary but measures have been identified and designed into the Proposed Development to ensure these activities are not precluded as a result of the Site's redevelopment. This includes a bat sensitive lighting strategy as detailed further in the submitted Design and Access Statement.
- 6.248. In line with the recommendations of the PEA and the low potential for roosting bats identified on the Site, Bat Emergence Surveys were undertaken in August 2021. A report summarising the findings of this has been prepared and submitted as part of the HPA. It confirms that no roosting bats were identified in any of the buildings on the Site and therefore the Proposed Development will have a negligible impact. However, low levels of commuting and foraging activity was noted on the Site and within the immediate surroundings. Therefore, a number of mitigation and enhancement measures been incorporated into the Proposed Development as part of the Illustrative Landscape Strategy. This includes a bat sensitive lighting strategy; retention and protection of existing trees where possible; additional landscaping to include new trees and wildlife-friendly species; and, bat boxes to be integrated into the new built form. On the basis of these measures, it is considered that the Proposed Development will actually result in improvements for roosting, foraging and commuting bats on the Site.

Illustrative Masterplan

- 6.249. Through the extensive greening of the Site as a result of an estate-wide comprehensive Illustrative Landscape Strategy, the Proposed Development on the basis of the Illustrative Masterplan has the potential to achieve a BNG of 146.42% (area based) and 70.72% (linear based).
- 6.250. Integral to the Illustrative Landscape Strategy is the maximisation of opportunities for new planting and habitat creation across all levels of the Proposed Development to include: at street level as part of the public realm; at roof level in the form of biodiverse green roofs; and vertically through façade greening in the form of climbing plants. Wildlife friendly landscaping will be provided at ground level, incorporating native tree, shrub and hedgerow planting as well as planting of herbaceous species of known biodiversity value. This will not only soften the urban environment but also establish a new green corridor north-south through the Site to connect to the existing habitat corridor that runs along the Grand Union Canal. A number of physical features will be incorporated into the new built environment to include bat bricks and boxes; swift bricks and boxes; house sparrow terraces; and, insect hotels.
- 6.251. Within the canal frontage new areas of soft landscaping, as a continuation of those within the Site, will provide new wildlife areas and corridors which will integrate into the established and existing habitats along the Grand Union Canal. This will improve the biodiversity value of this part of the Strategic Canal Corridor and, as a result of the combined public realm and landscape improvements along Western View, increase access for returning, new and existing local residents to nature and green infrastructure. The Proposed Development therefore provides an opportunity to satisfy the policy aspirations of Site Allocation SA23 and LPP2 Policy DMEI7.
- 6.252. Further consideration of the ecological enhancement features for the Outline Area will be undertaken as part of the detailed design development that will support future RMAs to maximise BNG on-site. However, on the basis of the outline parameters and design principles, the Illustrative Masterplan demonstrates how the Proposed Development can achieve significant biodiversity net gain; will connect and enhance the existing green network to include the biodiversity value of the Strategic Canal Corridor; and positively contribute to addressing existing deficiencies in access to nature and green infrastructure. It is therefore considered to be wholly compliant in planning policy terms having regard to NPPF 8, 174 and 180; LP Policy G6; and LPP2 Policy DMHB14 and DMEI7.

Detailed First Phase

- 6.253. As part of the estate-wide strategy for providing net gains to biodiversity on the Site, the Detailed First Phase will provide species rich new habitats and new tree planting around the perimeter of the blocks as well as within the communal (private) podium garden. This will also host an insect hotel, with façade greening on Blocks A and B and biodiverse extensive green roofs extending the network of ecological features upwards. On this basis, the Biodiversity Impact Assessment confirms that the Detailed First Phase will positively contribute to achieving BNG across the Estate which will significantly exceed the 10% requirement.
- 6.254. The Detailed First Phase sits at the northern end of the proposed new green corridor, at the entrance to the Site, and therefore provides an early and important opportunity to contribute to biodiversity improvement. It will establish the key principles that will continue to guide the redevelopment of the remainder of the Estate and demonstrate how these can be successfully integrated into the built environment to enhance the Site's role in the wider ecological network. The detailed element of the Proposed Development is therefore considered to fully conform with NPPF 8, 174 and 180; LP Policy G6; and LPP2 Policy DMHB14 and DMEI7.

Heritage, Townscape and Visual

- 6.255. NPPF 189 states that heritage “...assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”. In determining applications comprising proposals affecting heritage assets applicants are required to “...describe the significance of any heritage assets affected, including any contribution made by their setting” (NPPF 194) and local planning authorities should take this into account when considering potential impacts (NPPF 195). As part of this NPPF 197 c) outlines that “the desirability of new development making a positive contribution to local character and distinctiveness” should be considered.

- 6.256. In considering the potential impact of development proposals on the significance of a designated heritage asset, NPPF 199 explains that “...*great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)*”. This is irrespective of the level of any potential harm which requires “*clear and convincing justification*” (NPPF 200) and will only be consented where it is demonstrated that there are substantial public benefits that outweigh the harm (NPPF 201).
- 6.257. LP Policy HC1 considers heritage conservation and growth by setting out that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings is expected to be actively managed. It states that “*development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process*”.
- 6.258. At a local level, LPP2 Policy DMHB1 is clear that development proposals will be expected to avoid harm to the historic environment and aligns with the NPPF in setting out what should be taken into account when considering potential impacts. This includes supporting development that has an effect on heritage assets where “*opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily*”. More specifically, LPP2 Policy DMHB3 confirms that there is a presumption in favour of buildings, structures and features on the Local List and the effect of development proposals on the building’s significance and the scale of harm will be taken into consideration in stating that “*Proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building*”.
- 6.259. In regards to “tall” buildings and the wider townscape, to include the historic environment, as discussed in part earlier in this section, LP Policy D9 requires such development proposals to take account of the visual impact and avoid harm to the significance of heritage assets and their settings. Tall buildings will be expected to positively contribute to the character of the area and proposals that may result in harm will require clear and convincing justification consistent with NPPF 200.

- 6.260. As set out in Section 2 of this Statement, there are no local or statutorily Listed Buildings within the Site's red line boundary and the Site itself is not located in a designated conservation area. However, there are a number of heritage assets within close proximity, this includes the locally listed Silverdale Road Warehouse which sits adjacent to the Site's eastern boundary within the southern part of the Estate and the locally listed Old Crown Public House which sits outside of the Site to the west fronting Station Road, as the immediate sensitivities. Further afield within 500m of the Site are three Grade II statutorily listed buildings and two Conservation Areas as described in Section 2.
- 6.261. The locally listed Old Crown Public House comprises a two storey mid nineteenth century brick building. It is of historic interest as one of the remaining, and largely well preserved externally, public houses in Hayes from the mid-nineteenth century. It therefore is considered to have a role as a local cultural 'artefact', as well as long term association with the Grand Union Canal, with which it shares a historic context as well as a paired evidential value. It derives a mixed level of heritage importance from its surrounding setting, with post-nineteenth century development and infill having eroded the formative architectural context in which the building was constructed. It is therefore considered to derive its heritage importance through the association with the canal which contributes to its significant and forms a key part of its setting.
- 6.262. The Silverdale Road Warehouse forms part of a set of warehouses constructed as workshops in 1907. The historic interest of the warehouse building is foremost attributed to its role in the industrial development of Hayes during the late nineteenth and early twentieth centuries. The setting, however, has been fragmented and significantly eroded over time as a result of the continuously changing built environment, notably and within very close proximity, through recent planning permissions at Chailey Industrial Estate and Silverdale Road which forms part of Site Allocation SA23 alongside the Site. As a consequence, the setting of this locally listed building is regarded to provide little contribution to the significance of the asset.
- 6.263. In recognising the nearby heritage assets and their settings, as well as the potential for the Site to comprise "tall" buildings, the design-led approach to the regeneration of the Estate seeks to avoid undue harm and positively contribute to the enhancement of the wider townscape, to include the historic context. This has been applied to the Proposed Development as a whole and thereby on an estate-wide basis, as is evident from the submitted Illustrative Masterplan.

6.264. A HTVIA has been undertaken and informed the evolution of the Proposed Development. This has been submitted as part of the HPA and should be read in conjunction with the below, as only a summary of the relevant considerations.

Illustrative Masterplan

6.265. The HTVIA confirms that the area of the settings of both locally listed buildings, in which the Site lies, does not contribute to their heritage significance. Therefore the redevelopment of the Estate is not considered to give rise to the potential for any harm and instead provides an opportunity to enhance the existing settings through the addition of higher quality public realm and architecture.

6.266. As described in Section 2 and the submitted HTVIA, the wider townscape character is varied with a mix of uses, heights and architectural styles, eras and materials. The existing Estate is not considered to relate well to its surrounding urban fabric, with the streets to the east and west running north-south abruptly terminating along Pump Lane and with very poor permeability east and west in connecting to the High Street. It lacks an active frontage along Pump Lane and fails to integrate with its surroundings, creating a visual gap and isolated presence which obstructs the continuation of adjacent urban grain. It is therefore considered that there is ample scope for improvement through the regeneration of the Estate.

6.267. On the basis of the above, careful consideration has been given to massing of the Proposed Development and the spatial arrangement of built form alongside key design elements to include, but not limited to, areas of public realm, landscaping, public open space and movement routes, as can be seen from the Illustrative Masterplan. This has been considered in the context of the immediate setting and local plus wider views as agreed with LBH LPA Officers during the pre-application consultation process.

6.268. The views analysis contained within the submitted HTVIA demonstrates that the massing of the Proposed Development scheme responds to both the immediate and the wider context of the Site. This is through the placement of lower heights along the re-aligned Austin Road responding to the established neighbouring heights of properties to the east. This has resulted in limited visibility of the Proposed Development from the wider townscape setting around the Site.

- 6.269. The proposed taller elements, as no taller than the existing tall building on the Site, are concentrated within the southern part of the Site where this height is already established. As can be seen from the views enclosed within the submitted HTVIA this will respond to the existing taller and landmarks buildings to the south as well as the height to come forward through the consented redevelopment of the Silverdale Industrial Estate which, alongside Chailey Industrial Estate, will increase the height context to the east.
- 6.270. The HTVIA therefore concludes that there would be little, if any effect on the quality or character of longer distances views and that overall the Proposed Development would have a positive effect on visual and townscape receptors. It is similarly not considered to impact on the three statutorily listed buildings and two Conservation Areas identified within the Site's much wider context.
- 6.271. Drawing down to the immediate sensitives in terms of the two locally listed buildings, particular consideration has been given to the potential heritage impacts arising from the proposed southern blocks. The submitted Illustrative Elevations for the southern blocks show how, through block articulation and elevational treatment inspired by the historic industrial context together with a balcony strategy, new built form will carefully respond to the architectural significance of both locally listed buildings and contribute to improving their visual prominence and setting within local views of the streetscene.
- 6.272. In addition, the proposed widening of Silverdale Road as part of the Proposed Development, and as established through the outline parameters, will ensure an average separation distance of 21 metres between new built form and the locally listed Silverdale Road Warehouse to the east. In accordance with LP Policy HC1, this provides an opportunity for improved public realm which will enhance the overall setting for this building and enable the significance of the asset to be appreciated more readily as sought by LPP2 Policy DMHB3.
- 6.273. To the west, and in relation to the locally listed Public House, there will be a 25 metre separation distance with the outer building footprint of new built form within the south western corner of the Site, which is setback off the Site's western boundary as shown on Parameter Plan 2. The space currently located between the Public House and the existing built form on the Estate will be retained and therefore maintain the existing levels of separation as a minimum.

- 6.274. In addition, the setting of the Public House will be enhanced through the higher-quality architecture of the Proposed Development and the public realm and landscaping improvements proposed along the Site's frontage onto the canal, to include Western View and which will tie into the proposals for Station Road Bridge. Thereby, in accordance with LP Policy HC1 and LPP2 Policy DMHB3, the immediate environment which forms part of the building's setting and contributes to its significance through association with the Canal, will be enhanced.
- 6.275. Overall, the Proposed Development is therefore considered to not cause any harm to the identified heritage assets, having regard to their significance, and in fact provides an opportunity to better reveal this and positively contribute to the local character and distinctiveness in accordance with NPPF 197. The proposed built form, materiality, integrated movement routes and public realm / open space and landscaping together, as shown through the Illustrative Masterplan, will have a positive effect on the townscape character. In terms of views, when considered against the baseline position and visual sensitivity of respective views, the Proposed Development will overall result in a positive effect on identified visual and townscape receptors.
- 6.276. The HTVIA provides a thorough analysis of the Site and study area, and its context in relation to built heritage assets, townscape character and visual amenity and views. This has enabled a robust impact assessment of the Proposed Development to be undertaken for each of these related disciplines and demonstrate compliance with NPPF 189-201, LP Policies D9 and HC1 and LPP2 DMHB1 and DMHB23.

Archaeology

- 6.277. In conserving and enhancing the historic environment, and where sites subject to development proposals include or has the potential to include heritage assets with archaeological interest, NPPF 194 is clear that the proposal should be accompanied by a desk based assessment, and where necessary field evaluation. In decision-making, local planning authorities are expected to identify and assess the particular significance of any heritage asset that may be affected by a proposal and *"avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal"* (NPPF 195).

- 6.278. In line with the above, LP Policy HC1 expects “*development proposals to identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes*”.
- 6.279. At a local level, LPP2 Policy DMHB7 highlights the role of the Greater London Archaeological Advisory Service in advising LBH LPA on below ground heritage assets and states that they will work together to “*...ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed*”. Where this cannot be avoided the policy is clear that measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork in advance of development works. Any archaeological finds are then expected to be recorded, archived and reported accordingly.
- 6.280. In accordance with national, regional and local planning policy, an Archaeological Desk-Based Assessment has therefore been prepared and submitted as part of the HPA. This confirms that the Site has a low to negligible potential for encountering archaeological remains of Romano-British and post-medieval date; a low potential for remains of prehistoric, Anglo-Saxon, and medieval date; and, a high potential for remains of modern date. In turn, it is noted that the Site has been subject to several phases of significant development and redevelopment over the years and therefore it is considered that this will have had a destructive impact on the survival of any below ground archaeological deposits within the Site, should they be present.
- 6.281. On the basis of the above, the assessment concludes that the below ground potential of the Site is well understood and it is unlikely that the Site will yield any remains of significance. Therefore it is not considered that any further archaeological fieldwork is required on the Site and as such there is nothing to preclude the Proposed Development in accordance with NPPF 194 & 195, LP Policy HC1 and LPP2 Policy DMHB7.

Transport

- 6.282. In promoting sustainable transport, NPPF 105 outlines the expectation for the planning system to actively manage patterns of growth. “*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*”.

- 6.283. In respect of the above, NPPF 108 recommends the use of maximum parking standards where necessary to assist in managing the local road network and optimising the density of development in city and town centre locations as well as those well served by public transport. As such, development proposals are expected to prioritise pedestrian and cycle movements and facilitate access to high quality public transport (NPPF 112).
- 6.284. NPPF 111 is clear that “*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*”.
- 6.285. LP Policy T1 sets out the strategic approach to transport for London and, in line with encouraging the efficient use of land, expects development to respond appropriately to existing and future public transport connectivity and accessibility and mitigate against any adverse impacts on the transport network. LP Policy T2 requires development proposals to “*...deliver patterns of land use with facilitate residents making shorter, regular trips by walking or cycling*” and reference is made to the application of the Mayor’s Healthy Streets approach in achieving this. As such, development proposals should reduce the dominance of vehicles and be permeable by foot and cycle in connection with the wider public transport network.
- 6.286. LP Policy T4 reinforces the importance of assessing and mitigating transport impacts through development proposals and requires transport assessments / statements to be submitted as part of planning applications to ensure the impacts on the capacity of the transport network is fully assessed. Where necessary to address adverse transport impacts, mitigation should be identified either through on-site provision in the form of public transport, walking and cycling facilities and highways improvements or through financial contributions. It is clear that “*development proposals should not increase road danger*”.
- 6.287. In line with the above, the LP establishes minimum cycle parking standards under LP Policy T5, which should be applied to development proposals to encourage such sustainable modes of travel and remove barriers to access. In turn, LP Policy T6 establishes maximum car parking standards and is clear that “*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...*”. This is with the exception of adequately providing for disabled person parking.

- 6.288. LP Policies T6.1 to T6.5 then set out the relevant parking standards that should be applied to development proposals on a use class basis, to include appropriate provision for disabled persons and infrastructure to support electric vehicle charging.
- 6.289. At a local level, development proposals are “...required to meet the transport needs of the development and address its transport impacts in a sustainable manner” as set out under LPP2 Policy DMT1. In line with national and regional policy, in order for development proposals to be considered acceptable they should promote opportunities for travel by sustainable modes and ensure no significant adverse transport or associate environmental impacts on the transport network, as is reiterated under LPP2 Policy DMT2. A Transport Assessment or Statement and Travel Plan should be provided to demonstrate how the requirements of LPP2 Policies DMT1 and DMT2 have been addressed through the proposed development and identify mitigation where required.
- 6.290. LPP2 Policy DMT4 identifies forms of mitigation that LBH LPA may seek from development proposals that give rise to potential transport impacts and these relate to improving local public transport facilities and services. LPP Policy DMT5 establishes local cycle parking standards and expects “*development proposals located next to or along the Blue Ribbon Network will be required to enhance and facilitate inclusive, safe and secure pedestrian and cycle access to the network*”. LPP Policy DMT6 establishes local car parking standards and outlines that provision should contain “...*conveniently located reserved spaces for wheelchair users and those with restricted mobility*”.
- 6.291. In respect of deliveries and servicing specifically, LP Policy T7 states that development proposals should make adequate provision for servicing, storage and deliveries off-street, with on-street loading bays only used where this is not possible. This is in the interest of ensuring a safe, clean and efficient process with Construction Logistics Plans and Delivery and Servicing Plans expected to be prepared to demonstrate how this will be achieved in accordance with TFL guidance. LPP2 Policy DMT1 similarly reiterates the need for such to be adequately addressed through development proposals.

- 6.292. The transport strategy for the Proposed Development has been designed on an estate-wide basis in order to ensure the delivery of a cohesive movement network which maximises connections and accessibility both within the Site and in integrating into the existing network of the surrounding area. It is important therefore to consider the transport, access, parking and deliveries / servicing considerations of the Proposed Development as a whole in order to full understand any potential impacts and appreciate how it will function and form part of the local and strategic transport network. As is summarised below and within the submitted Transport Assessment, the regeneration of the Estate provides an opportunity to positively contribute to the promotion of sustainable travel within Hayes Town Centre.
- 6.293. For the Outline Area, Parameter Plan 4 defines the means of access into the Site as well as a framework of movement routes into and through the Estate across the various travel modes. For the Detailed First Phase, the submitted the Proposed Ground Floor Plan, Detailed Access Drawing and Temporary & S278 Works Key Plan set out in finer detail the proposed access, parking and servicing arrangements that will serve residents of Blocks A and B. Together, these underpin the Illustrative Masterplan.
- 6.294. Further details on the transport, access, parking and movement strategies for the Site are set out within the submitted documents prepared by Markides Associates as the project transport consultant and should be referred to in full, with the below providing a summary only. This includes a Transport Assessment (“TA”), Active Travel Zone Assessment (“ATZA”), Travel Plan (“TP”) Construction Logistics Plan (“CLP”) and Delivery and Servicing Plan (“DSP”). An ATZA has been undertaken to support the HPA in accordance with the latest TFL guidance as a means of identifying how people of all abilities can make key journeys that are essential to support car-free lifestyles. This forms part of the submitted TA and provides details on pedestrian and cycle movement routes connecting the Site and identifies possible improvements to enhance public transport connectivity commensurate with the Proposed Development impact itself and in compliance with Regulation 122 of CIL Regulations 2010 (as amended).

Access

Illustrative Masterplan

- 6.295. As evident from Parameter Plan 4, the proposed movement network seeks to build upon the Site's sustainable location and prioritise pedestrian and cycle travel within and through the Site in accordance with NPPF 112, LP Policies T1 and T2 and LPP2 Policies DMT1 and DMT2. The indicative routes run north-south through the Site, connecting to east-west routes which expand across the full width of the Site at four different intervals. Here the routes once again join into the Site's comprehensive network and/or to new or enhanced access points on the Site's boundaries. This provides increased permeability within the Site as well as improving accessibility to existing pedestrian and cycle routes within the surrounding area, providing an opportunity to connect the residential areas to the east and the High Street to the west via the Community Square and Grand Union Canal.
- 6.296. At present the existing Estate presents a barrier to such movement as a result of its layout and lack of defined routes and openings. The Proposed Development provides an opportunity to correct this not only through better defining and creating new routes but also as a result of the relationship between the proposed built form and adjoining spaces of public realm and open space which will ensure these routes are safe, direct and inclusive as can be seen from the Illustrative Masterplan. This will encourage travel via sustainable modes and therefore positively contribute to the local public transport and sustainable movement network of Hayes Town Centre as well as the Blue Ribbon Network in accordance with LPP2 Policy DMT5.
- 6.297. The Proposed Development will continue to provide vehicular access to meet the needs of existing and returning residents as well as to ensure accessibility for less mobile residents and servicing and deliveries. The primary vehicular access into the Site off Pump Lane will therefore remain and continue to extend the full north-south extent of the Estate. However, it will be re-positioned slightly to the west so that it sits further within the Site and provides a more central movement corridor which will include pedestrian and cycle routes.

- 6.298. Two east-west roads are proposed to lead off the primary corridor and provide visual and physical breaks between Development Zones 1 – 3 which in turn connect at two points to existing Crown Close along the west of the Site. At the junction to the north of the Community Square, the re-aligned Austin Road will also open up to provide one point of vehicular access out of the Site at this eastern edge, joining to Silverdale Road and the residential areas beyond. In accordance with LPP2 Policy DMT2, this is considered to represent a safe and efficient vehicular access strategy which continues to direct traffic onto the strategic road network.
- 6.299. As demonstrated through the submitted Transport Assessment, Parameter Plan 4 and the Illustrative Masterplan, the Proposed Development is considered to provide a comprehensive movement network which has been designed to adequately serve the needs of returning and future residents as well as provide wider accessibility benefits for the local community. It will encourage and facilitate regular travel via bicycle and foot and improve the connectivity of an existing sustainable location. It is therefore considered to be wholly compliant in planning policy terms having regard to NPPF 105, 108 and 112; LP Policies T1 and T2; and LPP2 Policies DMT1, DMT2, DMT4 and DMT5.

Detailed First Phase

- 6.300. Blocks A and B are located closest to Pump Lane, as an existing strategic route within the wider network. The Detailed First Phase therefore sits between two primary vehicular access points into the Site, to the east this will be via the re-aligned Austin Road and to the west, via Crown Close. These will be connected by the secondary internal estate road that runs to the south of Block B. A new access (details of which are submitted for approval under the HPA) will be created off Crown Close to directly serve the parking area located at the ground floor of both blocks which forms part of the podium layout.
- 6.301. All pedestrian access into Blocks A and B will be gained through the secure entrances at street level or internally via the podium parking area. Landscaped pavements will be provided off Pump Lane and Crown Close to facilitate this and connect back into the existing Estate.

- 6.302. Cycle access will be via the existing carriageways. In addition, the vehicular routes of Crown Close and the secondary internal estate route to the south, will be designed to ensure a low speed environment and through landscaping, materials and traffic-calming measures also facilitate safe cycle movement. This will ensure easy access for cyclists to the secure residential entrances located at ground floor on all three sides of the perimeter block as well as internally via the podium parking area where the cycle stores will be located.
- 6.303. In addition, temporary means of access for all travel modes will be provided as part of the Detailed First Phase in line with the Illustrative Demolition and Phasing Strategy. This is on the basis that the realignment of Austin Road will not take place until later on in the regeneration of the Estate, potentially as part of Phase 5. In the interim, temporary works are therefore required to facilitate resident access by car, bicycle and foot both around and into the two new residential blocks; provide temporary parking to serve the ground floor units as well as any displaced provision along the retained Austin Road during demolition and construction; and accommodate delivery and servicing requirements. The proposed arrangements are set out in detail on the submitted Temporary & S278 Works Key Plan and will be in place until the permanent access arrangements come forward.
- 6.304. On the basis of the above and submitted details, the Detailed First Phase sits consistently within the wider movement network for the Site and has been designed to meet the needs of returning and future residents as well as support the early delivery of improved east-west pedestrian and cycle links within the Site. It is therefore considered to confirm with NPPF 105, 108 and 112; LP Policies T1 and T2; and LPP2 Policies DMT1, DMT2, DMT4 and DMT5.

Trip Generation

- 6.305. The submitted TA considers the transport impact of the Proposed Development on the existing transport infrastructure, to include the local highway network and public transport. It confirms that the proposal will result in a net increase in people trips over and above the baseline position of the existing Estate. This is to be expected given the uplift in residential units and therefore increase in resident population on the Estate as a whole. However, in terms of vehicle trips, this will be limited to an additional 12 two-way trips in the AM peak period and 10 in the PM peak period.

- 6.306. This is not considered material and will not have an impact on the local highway network. It was therefore agreed with LBH LPA Officers during the pre-application process that no further capacity testing of the local highway network is required. Furthermore, it is supported by a comprehensive set of sustainable transport enhancement measures proposed to be delivered as part of the Proposed Development to encourage residents to travel by sustainable means, alongside a reduced number of car parking spaces to assist in reducing reliance on travel by car. This will be managed and monitored through a robust Travel Plan in line with the objectives set out in that submitted as part of the HPA.
- 6.307. The existing capacity of the public transport network plus enhancements gained through wider improvements proposed to the town centre and, as a result of Crossrail, are expected to easily accommodate the additional public transport usage generated by the Proposed Development. The submitted TA confirms that given the accessible location of the Site, any person trips will be distributed across the variety of routes and sustainable transport modes that are available to include rail, bus, cycling and walking. The change in total person movements will not therefore have a material effect on the existing public transport network within the vicinity of the Estate.
- 6.308. On the basis of the above and the submitted TA, the Proposed Development will not result in any adverse impacts on the local or strategic transport network and will not result in an increase in road danger. It does not trigger the requirements of LPP2 Policy DMT4 with appropriate infrastructure planned into the Proposed Development to ensure no adverse transport impacts and in turn, provide wider sustainable travel benefits. As such, it is considered to be wholly acceptable in transport terms, in accordance with NPPF 105 and 11; LP Policies T1 and T4 and LPP2 DMT1 and DMT2.

Car Parking

- 6.309. A total of 113 no. car parking spaces are proposed as part of the regeneration of the Estate. The majority of this will provide replacement car parking for returning residents to the Estate (110 no.) as well as provide replacement and new disabled bays for “Blue Badge” holders (15 no.). The potential for up to five car club spaces on the Estate has also been identified. This would come forward as part of the total parking provision, with one space provided as part of the Detailed First Phase and a further four to come forward within the Outline Area as demand dictates.
- 6.310. As part of the Landlord’s Offer to returning residents of the existing Estate, and in accordance with the Mayor’s Good Practice Guide to Estate Regeneration (February 2018), LBH has committed to the re-provision of car parking for those residents returning to the Estate and who currently hold a parking permit.
- 6.311. Over and above the re-provision, however, the Proposed Development is car-free in accordance with LP Policy T6 and with the exception of providing provision for disabled persons in accordance with the standards set out under LP Policies T6.1 and T6.5. This approach has received support from LBH LPA Highways and TFL through constructive pre-application consultation. This provision and its distribution is considered further below in the context of the Outline Area and Detailed First Phase.

Illustrative Masterplan

- 6.312. On the basis of the Illustrative Masterplan and the indicative unit mix, 84 no. spaces are proposed on-site located at ground level beneath podium areas serving the residential blocks. An additional 29 no. spaces are to be provided on-street along the proposed vehicular routes within the Site, as defined through Parameter Plan 4. This equates to a ratio of 0.17 car parking spaces per residential unit on-site, plus the additional on-street provision which combined equates to a ratio of 0.23 car parking space per residential unit. Tables 13a, 13b and 13c within Section 4 of this Statement set out the maximum and indicative proposed car parking requirement on a Development Zone and block by block basis.

- 6.313. As noted above, it is acknowledged that the Site is located within a Town Centre and Controlled Parking Zone and benefits from a PTAL of 4-5. In policy terms, the Site's location and very good PTAL, with the higher rating achieved toward the Site's southern edge, means that the starting point for new development should be to be car-free. However, in considering development proposals subject to PTAL of 4, there is policy context for a parking ratio of up to 0.5 – 0.75 spaces per unit in accordance with LP Policy T6.1. In addition, recently consented schemes within LBH LPA demonstrate parking ratios for residential development between 0.48 to 0.73 spaces per residential unit. For example, the scheme at Fairview, Clayton Road, for 400 units, proposed 191 parking spaces, which equates to a ratio of 0.48 per unit. The redevelopment of the Nestle Factory site has been approved to provide 1,381 new homes with 692 car parking spaces provided, which represents a ratio of 0.5 per unit.
- 6.314. The Proposed Development, inclusive of re-provision plus on-street parking will therefore sit well below these levels established to be acceptable on other nearby sites. The level of car parking required to meet existing returning residents is therefore considered appropriate within the Site's context with the Proposed Development "car-free" over and above replacement with the exception of disabled persons parking.
- 6.315. In addition, the provision of car parking on the Site, will be managed via a designated permit programme. This will ensure that existing returning residents have an allocated car parking space either on-site or on-street. For new residents, a "car-free" restriction will be applied where they will not be allocated on-site car parking or be permitted to apply for parking permits within the on-street network unless they are "Blue Badge" holders. This is detailed further in the submitted Transport Assessment.
- 6.316. In terms of disabled persons parking provision, the Proposed Development will provide 15 blue badge car parking bays which equates to 3% overall and therefore satisfies the requirements of LP Policies T6.1 and T6.5. Furthermore, 20% of the car parking spaces estate-wide will be equipped with electric vehicle charging points, as active provision, and all remaining car parking spaces will be fitted the necessary infrastructure to enable future connection subject to demand, and therefore provide passive provision. This is in accordance with the requirements of LP Policy T6.1.

6.317. On balance, in light of the Site's PTAL 4-5 range and the overriding commitment to returning residents with the development otherwise designed to be car-free, this level of provision has been agreed to be acceptable in principle with both TFL and LBH LPA Highways Officers during the pre-application consultation process. In turn, the trip generation assessment demonstrates that this level of car parking within the Site will not have an adverse impact on the local or strategic highway network and is anticipated to positively contribute to the reduction in car ownership levels within Hayes Town Centre as a result of improved accessibility to public transport and sustainable travel modes. The Proposed Development is therefore considered to be acceptable in transport terms and conform with NPPF 105 -112; LP Policies T1, T4 and T6-6.5; and LPP2 Policies DMT1, DMT2 and DMT6.

Detailed First Phase

6.318. Consistent with the estate-wide car parking strategy, a total of 22 car parking spaces will be provided as part of the Detailed First Phase. This will include 19 car parking spaces provided beneath the podiums at ground level of Blocks A and B, to include 2 disabled bays for "Blue Badge" holders. In addition, 3 car parking spaces will be provided on-street along the secondary internal east-west estate road to the south of Block B, to include 1 disabled bay for "Blue Badge" holders and 1 car club space.

6.319. This equates to a ratio of 0.28 car parking spaces per residential unit based on the Detailed First Phase only and 3.8% provision of car parking for disabled persons. It is therefore considered to be wholly in-keeping with the overarching principles established and agreed with TFL and LBH LPA Highways Officers. It will satisfy the 3% requirement for disabled persons parking set out under LP Policy T6.1 upfront and early on in the regeneration of the Estate and provide 20% active charging facilities.

Cycle Parking

Illustrative Masterplan

6.320. On the basis of the Illustrative Masterplan and indicative unit mix for the Outline Area, a total of 912 no. long-stay spaces will be provided for future and returning residents as well as 16 no. short-stay spaces for visitors. This in addition to 1 no. long-stay space and 2 no. short-stay spaces to serve the proposed Community Space. This is in accordance with the requirements of LP Policy T5 derived on a use and unit type basis.

- 6.321. Table 14 within Section 4 of this Statement sets out the proposed maximum and indicative cycle parking requirement on a Development Zone and block by block basis. The number of cycle parking spaces will however be subject to the final Unit Mix on a phase by phase / block by block basis and in accordance with the Indicative Unit Range Mix (%). It will therefore be determined and confirmed through future RMAs, to include provision for the Community Space.
- 6.322. Resident long-stay cycle parking will be provided in secure stores located at the ground floor of residential blocks with short-stay provision for visitors distributed within the public realm, to include around the Community Square. These have been designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and therefore both the quantity and quality of provision is considered to fully comply with LP Policy T5 and LPP2 Policy DMT5.

Detailed First Phase

- 6.323. For the Detailed First Phase, a total of 149 no. long-stay spaces will be provided for future and returning residents as well as 4 no. short-stay spaces for visitors. This is based on the fixed Unit Mix for the Detailed First Phase as set out at Table 16 and therefore wholly accords with the requirements of LP Policy T5.
- 6.324. The resident and visitor spaces will be provided within two secure stores located within the podium parking areas at the ground floor of Blocks A and B. These will be accessed via the internalised parking areas but both benefit from frontages onto Pump Lane and Austin Road respectively. The provision will comprise a mix of two-tier racks and Sheffield stands.
- 6.325. As can be seen from the submitted drawings for the Detailed First Phase, these have been designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and therefore both the quantity and quality of provision is considered to fully comply with LP Policy T5 and LPP2 Policy DMT5.

Refuse and Servicing

Illustrative Masterplan

- 6.326. The Proposed Development, on the basis of the Illustrative Masterplan, has been designed to include one loading bay within each of the secondary internal estate roads that runs east-west between the perimeter blocks. This is in addition to provision on the re-aligned Austin Road, adjacent to communal bin stores.
- 6.327. For those Development Zones fronting Crown Close, refuse collection will occur on-street. For residential units within Development Zone 4 at the southern end of the Site, a satellite bin store on the south western corner will rely on management to transfer these bins to a communal store adjacent to the Silverdale Road frontage, with the car park access acting as a turning head in this location.
- 6.328. It will therefore facilitate safe, clean and efficient delivery and servicing operations, primarily off-street, in accordance with LP Policy T7 and LPP2 Policy DMT1.

Detailed First Phase

- 6.329. Communal bin stores are proposed at ground floor within both Blocks A and B, along their respective frontages onto Austin Road and Crown Close. These have been located to ensure that refuse collection points are within a 10m drag distance for the LBH refuse team.
- 6.330. A dedicated loading bay will be provided adjacent to the bin store fronting Austin Road, allowing refuse collection to take place off the carriageway. For the bin store fronting Crown Close, on-street refuse collection is proposed given the carriageway width of 5.5m allows a large vehicle to pass a stationary refuse collection vehicle.
- 6.331. A loading bay is then proposed within the internal estate road, to the south of Block B, sized to accommodate more general delivery demands generated by vans such as online shopping and supermarket deliveries. This will complement the provision on Austin Road and each of the loading bays will be supported by an appropriate traffic regulation order to manage hours of operation and length of stay.

- 6.332. It will therefore facilitate safe, clean and efficient delivery and servicing operations, primarily off-street and has been designed to ensure adequate space and storage for associated arrangement in line with the anticipated needs of returning and future residents. It is therefore considered to conform with the requirements of LP Policy T7 and LPP2 Policy DMT1.

Construction and Traffic

Illustrative Masterplan

- 6.333. A CLP has been prepared in support of the HPA and sets out how the delivery of the Proposed Development will be managed to minimise the impacts of construction on the surrounding highway network, to include the pedestrian and cycling environment. A detailed CLP will be produced as the detailed design progresses and will be secured through an appropriately worded planning condition. However, for the purposes of demonstrating the intended approach to ensure there are no adverse impacts as a result of the Proposed Development, the submitted CLP is considered to address the requirements of LP Policy T7 and TFL Construction Logistics Plan Guidance (2017).

Detailed First Phase

- 6.334. The submitted CLP provides details specifically on how the demolition and construction of the Detailed First Phase will be undertaken to minimise impacts on the surrounding highway network, to include the pedestrian and cycling environment. It is therefore not considered that a planning condition will be required to secure a further level of information but that the Principal Contractor once appointed will prepare a Method Statement in accordance with the submitted CLP and apply for relevant licences.

Energy and Sustainability

- 6.335. Achieving sustainable development sits at the heart of national planning policy guidance and the environmental considerations, to include moving to a low carbon economy, form one of three objectives that are to be pursued through the planning system as a result. NPPF 153 encourages local planning authorities to adopt proactive strategies to mitigate and adapt to climate change. New developments are therefore expected to be planned and designed in order to help to reduce greenhouse gas emissions and through a positive strategy for energy utilise renewable and low carbon energy and heating measures (NPPF 154 and 155).

- 6.336. In line with the above, LP Policy GG6 “*seeks to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050*”. LP Policy SI 2 states that “*major development should be net zero-carbon*” and in achieving this should reduce greenhouse gas emissions in both operation and demand in line with the energy hierarchy set out the policy. This comprises four individual but interrelated strands which include “be lean”, “be clean”, “be green” and “be seen”. Planning applications for major development proposals are required to include a detailed energy strategy to demonstrate how the zero-carbon target will be met in accordance with these.
- 6.337. LP Policy SI 2 goes on to state “*a minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development...*” and residential development should achieve 10 per cent through energy efficiency measures. Where zero-carbon cannot be achieved on-site, any shortfall should be provided in the form of a financial contribution to the borough’s offset fund or through an alternative off-site proposal. Development proposals referable to the Mayor, such as this, are also expected to be accompanied by a Whole Life-Cycle Carbon Assessment to demonstrate the anticipated whole lifecycle carbon emissions calculated from development over its lifetime and identify actions taken to reduce these.
- 6.338. LP Policy SI 4 outlines how development proposals should minimise and manage heat risk. It explains that energy strategies submitted in support of major development proposals demonstrate should demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems. The policy goes on to then establish a cooling hierarchy with which such strategies should comply.
- 6.339. LPP2 Policy DME12 states “*all developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets*” and similarly requires all major development proposals to be accompanied by an energy assessment. Consistent with LP Policy SI 2, the local policy expects these reductions to be achieved on-site but where the targets cannot be met, an off-site contribution will be sought for any shortfall.

- 6.340. LPP2 Policy DMEI 3 sets out a requirement for all major developments to be designed to enable connection to a Decentralised Energy Network (DEN). For developments within 500 metres of an existing DEN, it will be expected to connect to the network unless it can be demonstrated that it is not feasible or reasonable. Where a development is located within 500 metres of a planned future DEN which is likely to be operational within 3 years of the grant of planning permission, it will be expected to provide a means for connection unless again it can be demonstrated that it is not feasible or reasonable.
- 6.341. In accordance with the above regional and local planning policy requirements, an Energy Statement and Sustainability Strategy has been submitted as part of this HPA to cover both the Outline Area and Detailed First Phase. As detailed further below, it sets out the comprehensive approach that will be consistently applied to the regeneration of the Estate as a whole in seeking to reduce the environmental impact of the Proposed Development, in terms of both operation and demand.
- 6.342. It is important to note that in relation to the existing Estate, the Options Appraisal (October 2020), prepared by Savills in support of the Case of Regeneration (as summarised in Section 3 of this Statement) confirms that “...the current stock has poor energy efficiency performance as evidenced by EPC data...”. The existing properties are understood to currently achieve EPC ratings of between D and F and, therefore do not meet the relevant regulations which requires dwellings to meet an energy efficiency standard of C under the Energy Performance Certificate (EPC) ratings 2030. In seeking to meet up to date policy requirements and building standards, the Proposed Development, will therefore provide significant betterment in the standard of accommodation on the Site for both returning and new residents when compared to the existing provision.

Illustrative Masterplan

- 6.343. The submitted Energy Statement and Sustainability Strategy provides details on the proposed measures and commitments that have been integrated into the Proposed Development and will guide the detailed design of future phases. As set out in the submitted document, this is following consideration of a number of options to identify the most appropriate form of energy for the regeneration of the Estate and in seeking to reduce all greenhouse gas emissions in accordance with the energy hierarchy as well as in striving to achieve zero carbon in accordance with LPP2 Policy DMEI2 and LP Policy SI 2.

- 6.344. The proposed preferred energy strategy for efficiency purposes comprises a hybrid solution using a fabric first approach comprising passive and active design measures at the “Be Lean” stage; a centralised heat pump system, incorporating Air Source Heat Pumps (ASHP’s) at the “Be Clean” stage; and , Photovoltaic (PV) panels to supply renewable electricity at the “Be Green” stage. On the basis of the Illustrative Masterplan, this will achieve a reduction in CO2 emissions of 100% and therefore demonstrates the potential for net carbon-zero to be achieved on-site without any off-site requirements.
- 6.345. In giving regard to LPP2 Policy DMEI 3, it is recognised that there is a planned future Decentralised Energy Network (DEN) within 100 metres of the Site. However, from pre-application engagement with LBH Officers it is understood that this is unlikely to become operational in the near future. Nonetheless, the Proposed Development and energy strategy has been designed to facilitate connection to the network in the future should it be demonstrated that this is viable, feasible and reasonable at that point in time. It is therefore considered the Proposed Development has been suitably future proofed to satisfy the requirements of LPP2 Policy DMEI 3 and no further action is required at this stage
- 6.346. On the basis of the above and the submitted Energy Statement and Sustainability Strategy, it is clear that the construction and operation of the Proposed Development can be designed in order to optimise its environmental performance and contribute to the regeneration of the Estate in the most sustainable way. The proposed strategy has been subject to positive pre-application engagement with both LBH LPA and GLA Energy and Sustainability Officers and regarded to be acceptable in principle. It is therefore considered to meet the requirements of NPPF 153 – 155, LP Policy SI 2 and LPP2 Policy DMEI2 and DMEI3.
- 6.347. In regards to overheating, and the Outline Area, the submitted Energy and Sustainability Statement demonstrates how the potential for internal overheating can be minimised through appropriate design solutions in accordance with the GLA’s cooling hierarchy. As is evident from the submitted assessment, this establishes guiding principles which have informed the Illustrative Masterplan and will similarly inform the detailed design development work undertaken to support future RMAs in order to satisfy the requirements of LP Policies D6 and S1 4.

6.348. In addition, a Whole Life-Cycle Carbon Assessment has been undertaken and a Circular Economy Statement has been prepared. These have been submitted as part of this HPA to demonstrate the embodied carbon usage of each stage of the Proposed Development over its lifetime. It relates to the Estate as a whole, on the basis of the Illustrative Masterplan, with calculations and bill of materials for the Outline Area based, pro-rata, on the Detailed First Phase to ensure an accurate basis for assumptions. These figures will therefore be subject to the detail that comes forward as part of future Reserved Matters Applications but provides an indication of what can be achieved on-site on the basis of the fixed Detailed First Phase and illustrative application of outline parameters. The submitted statement clearly sets out how the Proposed Development satisfies the requirements of LP Policy SI 7 and the supporting assessment demonstrates that the Proposed Development will comfortably meet the GLA “benchmark” figures for Whole Life Carbon and has the potential to achieve the “aspirational” benchmark figures.

Detailed First Phase

6.349. The submitted Energy Statement and Sustainability Strategy for the Detailed First Phase provides specific details on the proposed measures and commitments that will come forward within Blocks A and B. This is wholly consistent and has been prepared in conjunction with the estate-wide strategy to ensure a comprehensive approach to redevelopment and enable the first phase to positively contribute to the strategic environmental objectives of the Proposed Development.

6.350. In summary, the proposed sustainability and energy saving measures which have been designed into Blocks A and B in respect of the “Be Lean” stage of the LP Energy Hierarchy include a combination of passive and active design measures. This comprises high levels of insulation, airtightness, energy efficient lighting and high efficiency / low SFP heat recovery mechanical ventilation. As a result of these measures, the target fabric energy efficiency of the residential blocks has been improved and results in a reduction in carbon dioxide emissions of 20% against Building Regulations. This therefore exceeds the 10% requirement at this stage of the Energy Hierarchy in accordance with LP Policy SI 2.

- 6.351. For the “Be Clean” stage, as noted above, the energy strategy has been designed to ensure the Proposed Development, including the Detailed First Phase, is future-proofed and can be connected to a nearby District Heating Network in the longer-term should this come forward and be feasible and viable at that point in time. Given the LP and expected changes to Building Regulations, which no longer endorse the implementation of on-site Combined Heat and Power systems (“CHP”), a CHP is not proposed within the Detailed First Phase. However, the LP is clear that where heat pumps are used as part of a building heating network then the carbon savings attributed to their use should be included under the “Be Clean” stage of the Energy Hierarchy. A centralised heat pump system comprising ASHPs for domestic hot water and space heating is proposed per block and results in a 53% reduction in domestic emissions against Building Regulations.
- 6.352. In terms of the “Be Green” stage, PVs are proposed across the roofs of Blocks A and B. This will complement the centralised heat pump system and result in a further reduction of 29% against Building Regulations. Finally, as set out in the submitted Energy and Sustainability Statement, the proposed strategy and measures will be monitored in the interest of ensuring the energy performance of the blocks is fully optimised in accordance with the “Be Seen” stage.
- 6.353. On the basis of the above, the Detailed First Phase successfully demonstrates how the preferred energy strategy for the Estate performs against the LP Energy Hierarchy and will achieve a 102% reduction beyond Building Regulations. It will therefore achieve net zero-carbon on-site and provide significantly better quality homes for existing returning and new residents early on in the regeneration of the Estate.
- 6.354. The proposed strategy has been subject to positive pre-application discussions with both LBH LPA and GLA Energy and Sustainability Officers and the detailed comments received from the GLA have been addressed directly through the submitted Energy and Sustainability Statement for the Detailed First Phase. This includes the substantiation for Seasonal Coefficient of Performance (SCOP) for the heat pump and calculations to support the amount of heating provided by the electric heating and controls to demonstrate that heating via the pumps is the primary energy source. It is therefore considered to meet standards in accordance with NPPF 153 – 155, LP Policy SI 2 and LPP2 Policy DMEI2 and DMEI3.

6.355. In regards to overheating and in compliance with LP Policies D6 and S1 4, the Overheating Assessment submitted as part of this HPA demonstrates how the potential for internal overheating has been minimised through appropriate design solutions and in accordance with the GLA's cooling hierarchy. In testing the detailed unit layouts of Blocks A and B, it confirms that the blocks have been well designed to adapt and deal with overheating in the near future when compared with current data and near future data. They ensure very high levels of operable windows and the provision of blinds as part of the build specification, which will enable future residents to adapt the units in order to achieve thermal comfort. The design of the glazing and the overhangs in the façade is noted to have assisted in minimising the amount of solar gain getting in through the building fabric. The Detailed First Phase of the Proposed Development is therefore considered to provide a good standard of internal residential amenity.

Flood Risk and Drainage

6.356. NPPF Chapter 14 sets out the important role of the planning system in recognising and responding to a changing climate. This includes taking into account the long-term implications of flood risk and supporting *"...appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts..."* (NPPF 153). On this basis, NPPF 159 is clear that *"inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere"*. NPPF 167 reiterates that in decision-making, local planning authorities should ensure that flood risk is not increased elsewhere. In seeking to secure this, major developments are expected to incorporate sustainable drainage systems and NPPF 169 sets out the criteria that such systems should comply with. This includes providing multifunctional benefits where possible.

6.357. LP Policy SI 12 reinforces national policy guidance and seeks to ensure that development proposals comply with the flood risk assessment and management requirements set out under this policy. It goes on to state that *"development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed..."*.

- 6.358. LP Policy SI 13 seeks to ensure that sustainable drainage systems are incorporated into development proposals and should aim to achieve greenfield run-off rates with water run-off managed as close to its source as possible. It goes on to establish the drainage hierarchy which such systems should be designed with regard to. In line with NPPF 169, LP Policy SI 13 expects drainage systems to promote multiple benefits to include *“increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation”*.
- 6.359. Consistent with national and regional policy, at a local level, LPP2 Policy DMEI9 expects development to be directed towards areas of lower flood risk (ie. Flood Zone 1), and be designed to ensure it is resilient to all sources of flooding. LPP2 Policy DMEI 10 sets out how all new build developments will be *“....required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS)...”* and refers back to the drainage hierarchy contained within the former LP but as carried forward under LP Policy SI 13.
- 6.360. In line with the above, LPP2 Policy DMEI 10 goes on to state that developments should be *“...designed to reduce surface water run-off rates to no higher than the pre-development greenfield run-off rate in a 1:100 year storm scenario, plus an appropriate allowance for climate change for the worst storm duration”*. The incorporation of rain gardens is promoted and it is expected that SuDS will be designed with appropriate methods to avoid pollution of the water environment.
- 6.361. With reference to the EA's Flood Map for Planning, the Site is located within Flood Zone 1 which indicates low probability of flooding and therefore in accordance with LPP2 Policy DMEI9 is located in an appropriate low risk area.
- 6.362. A Flood Risk Assessment and Drainage Strategy have been submitted as part of this HPA to cover both the Outline Area and Detailed First Phase and set out the comprehensive approach to water management and drainage that will underpin the regeneration of the Estate as a whole. In accordance with national, regional and local planning policy requirements, the submitted assessment and strategy demonstrates that the Proposed Development will be safe from all sources; incorporates appropriate management and drainage methods; and, will not result in an increase in flood risk within the Site or elsewhere.

- 6.363. The Proposed Development is identified to be at a low risk of flooding from all sources with the exception of groundwater, where it is considered to be at medium risk albeit the potential risk is localised to areas of highway and there is no evidence of past incidents from the data analysed. The design incorporates a sustainable drainage system which has been designed to accommodate the 100-year rainfall event with a 40% allowance for climate change. As set out in the submitted Drainage Strategy, and based on the Illustrative Masterplan, the system will comprise a number of urban drainage methods to include green roofs, rain gardens, soft landscaping, filter drains and below ground attenuation tanks. This therefore specifically addresses the requirements of LPP2 Policy DMEI10 by incorporating rain gardens as well as filtering and treatment methods to avoid pollution to the water environment. It also aligns with drainage hierarchy set out under LP Policy SI 13 by facilitating rainwater infiltration, attenuation via green infrastructure features and discharge direct to the existing network introducing controlled measures in the form of surface water sewers / drains.
- 6.364. As a result of the combined measures, the submitted Drainage Strategy confirms that the Proposed Development will significantly reduce run-off and can achieve greenfield run-off rates across the Estate as a whole in accordance with LP Policy SI 13 and LPP2 Policies DMEI9 and DMEI10. On the basis of the Illustrative Masterplan, the proposals will restrict run-off to a Qbar rate of 9.9 l/s which will provide significant betterment when compared to the existing drainage position to include 98% against the 100-year brownfield rate and 96% against the 1-year brownfield rate.
- 6.365. Noting the long-term nature of the Proposed Development, the sustainable drainage system will be installed in intervals as part of the comprehensive approach to the phasing of the regeneration of the Estate. As set out in the submitted Illustrative Demolition and Construction Phasing Strategy, this has been configured to ensure that the necessary new infrastructure, such as drainage, will come forward alongside residential units as is appropriate on a phased and/or zonal basis and therefore is in place to support the needs of future residents at each point of the delivery programme. This is in addition to ensuring that live drainage serving the existing buildings on the Site will be maintained for as long as is necessary in line with their retention and occupation ahead of redevelopment.

6.366. On the basis of the above, the comprehensive approach to water management and drainage is considered to wholly accord with the guiding principles of the NPPF and the requirements of LP Policies SI 12 and SI 13, and LPP2 Policies DME19 and DME110. It incorporates appropriate methods to ensure the Proposed Development is safe from all potential sources of flooding over its lifetime and with a sustainable drainage system and attenuation features in place will ensure that the risk of flooding is not increased on the Site or elsewhere. In turn, the integrated methods and features will contribute to improved water quality, enhanced biodiversity and urban greening providing multiple benefits as sought by NPPF 169 and LP Policy SI 13.

Air Quality

6.367. In seeking to conserve and enhance the natural environment, NPPF 186 expects planning policies and decisions to sustain and contribute towards compliance with relevant limit values and national objectives. This includes taking into account Air Quality Management Areas and goes on to state that *“opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement”*.

6.368. LP Policy SI 1 is clear that development proposals should not lead to *“a) further deterioration of existing poor air quality; b) 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; and c) create unacceptable risk of high levels of exposure to poor air quality”*. As such, development proposals will be expected to be at least Air Quality Neutral and, for development proposals in Air Quality Focus Areas, should demonstrate that design measures have been used to minimise exposure. Air Quality Assessments are required to be submitted as part of planning applications for major development proposals to demonstrate compliance with this policy.

6.369. At a local level, LPP2 Policy DME114 expects development proposals to *“...demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants”*. Therefore, as a minimum, development proposal should be at least “air quality neutral”, incorporate sufficient mitigation to ensure no unacceptable risk to sensitive receptors and actively contribute towards the improvement within Air Quality Management Areas.

- 6.370. The Site is located within an Air Quality Management Area and Air Quality Focus Area and, in accordance with LP Policy SI 1, an Air Quality Assessment has been undertaken and submitted as part of this HPA. The Assessment has given consideration to Detailed First Phase based on the proposed floor and unit arrangements and proposed building specifications. The Outline Area has been assessed on the basis of the maximum parameters, as established through the Parameter Plans, and the Illustrative Masterplan. It therefore provides an indication of the air quality impacts of the Proposed Development and establishes guiding principles which will inform the detailed design that comes forward as part of future RMAs to ensure continued compliance with planning policies cited above.
- 6.371. The Air Quality Assessment (AQA) identifies in terms of the potential for construction dust impacts that with the proposed mitigation in place, the overall residual effect will be “not significant”. In taking into consideration anticipated volumes of demolition and construction traffic, the maximum duration of the demolition and construction phases and the implementation of a Construction Environmental Management Plan (CEMP), emissions will be likely to be “not significant”. Specific mitigations are identified at Section 6 of the AQA and, at this stage in the planning and development process, this has informed the submitted Illustrative Demolition and Phasing Strategy (including Demolition and Construction Method Statement) and the Outline Constructions Logistics Plan.
- 6.372. The overall effect, without mitigation, of operational development-generated traffic on existing properties will be “not significant”. Similarly, the impact of development-generated traffic on sensitive locations tested within the Proposed Development, in terms of site suitability, will be “not significant”. Therefore, future residents will experience acceptable air quality and the Site is considered to be suitable for its continued end-use a residential without the need for any mitigation. Finally, the impact of development-generated traffic on identified ecological receptors will likely be “not significant”. Therefore, no mitigation measures have been recommended in respect of any of the above.
- 6.373. In seeking to be at least “air quality neutral” in accordance with LP Policy SI 1 and LPP2 Policy DMEI14, the Air Quality Neutral Assessment confirms that it is concluded that the Proposed Development will be better than “air quality neutral” in terms of “transport emissions”. The Proposed Development will also be better than “air quality neutral” in terms of “building emissions” (on-site building emissions will be zero).

6.374. Overall, the assessment demonstrates that the Proposed Development will not have any significant impact in regards to air quality, both in terms of the health and quality of life for existing neighbouring residents and returning and new residents to the Estate. The Proposed Development will be better than “air quality neutral” and, on the basis of the Illustrative Masterplan. It is therefore considered to satisfy the requirements of NPPF 186, LP Policy SI 1 and LPP2 Policy DME14 and provide the potential for air quality positive development.

Noise

6.375. NPPF 185 expects planning policies and decisions to ensure that new development is appropriate for its location taking into account the likely effects, to include cumulative effects on living conditions. As such, new development should “*mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life*”.

6.376. LP Policy D13 establishes the “Agent of Change” principles which places the responsibility for mitigating the impact of noise and other nuisances on new development on the applicant. This in the interest of ensuring existing “*...noise and other nuisance- generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them*”. As such, development proposals are expected to be designed to mitigate and minimise existing and potential nuisances.

6.377. LP Policy D14 is consistent with national planning policy guidance and establishes a criteria which should be followed in order to “*reduce, manage and mitigate noise to improve health and quality of life*”. This includes “*mitigating and minimising 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*” and “*improving and enhancing the acoustic environment...*”. Good acoustic design principles are expected to be incorporated into noise-sensitive developments to mitigate the potential for adverse effects where they cannot be separated from noise sources without undue impact on other sustainable development objectives.

- 6.378. At a local level, LPP1 Policy EM8 states that “*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*”. It is then considered under LPP2 Policies DMT1 and DMT2 in relation to managing transport impacts where it is outlined that new developments should ensure they do not result in adverse effects or deteriorate noise or local amenity as a result of the associated traffic movements.
- 6.379. A Noise Assessment has been undertaken and submitted as part of this HPA which determines the existing environmental noise climate at the Site, identifies any potential impacts on future residents of the Proposed Development and outlines any potential impacts on neighbouring sensitive receptors as a result of the Proposed Development. Where potential impacts have been identified, appropriate mitigation is proposed. For the Detailed First Phase this has informed and been designed into the Proposed Development and for the Outline Area this establishes good acoustic design principles that will inform the detailed design development work undertaken to support future RMAs.
- 6.380. As part of the Noise Assessment, an environmental noise survey was undertaken to obtain baseline noise levels generated by the main noise sources affecting the Site. This established Pump Lane at the northern end of the Site to be the main noise source as a primary vehicular route within the local highway network. Based on the measured sound levels, the assessment has identified that elevated facades in close proximity to Pump Lane could be at “high risk” with all other facades to be at “medium risk”. Having regard to LP Policy D13 and recognising and responding to the fact that this is an existing noise generating source, it has therefore informed the design and building specification of Blocks A and B within the Detailed First Phase (as discussed further below).

Illustrative Masterplan

- 6.381. In terms of construction, given the proximity of neighbouring noise sensitive receptors, to include residential properties to the Site, it is considered that associated activities to include site clearance, preparation and construction noise may impact these receptors. However, through best practice measures as set out in the submitted assessment and Illustrative Demolition and Phasing Strategy (including Demolition and Construction Method Statement), it is considered that noise from construction operations can be controlled and monitored to ensure the relevant limits are not exceeded.

6.382. During occupation, and based on the Illustrative Masterplan, the Proposed Development inclusive of both outline and detailed elements, will have a negligible impact on the surrounding environment in terms of traffic noise. This is on the basis that the Proposed Development will result in a reduction of car parking on-site when compared to the existing provision and provide new and enhanced pedestrian and cycle routes promoting and facilitating travel by sustainable modes. Therefore, as set out earlier within this section, the Proposed Development will not have a material impact on the existing highway network in terms of vehicular movement so there will be no adverse impacts arising in relation to road traffic noise. It is therefore considered to be fully accord with the requirements of LPP2 Policies DMT1 and DMT2.

6.383. The Outline Area is considered to experience lower ambient noise levels than the Detailed First Phase and therefore not require the same upgraded glazing or ventilation specifications. The assessment confirms that with commensurate mitigation in the form of a Type 2 glazing specification, residential units within the Outline Area will provide an acceptable noise climate for future residents. In terms of the external private amenity spaces and communal gardens, it is noted that the configuration of the blocks within the Illustrative Masterplan seeks to maximise the provision of screening within the estate itself. Therefore, on the whole the external sound levels are expected to meet the upper guideline value with the exception of a limited number of units at more exposed locations where there is the opportunity for this to be sufficiently dealt with and mitigation incorporated as part of the detailed design stage of these later phases in support of future RMAs.

6.384. On the basis of the submitted assessment, it is therefore considered that the Proposed Development will not result in any residual significant or other adverse impacts on the health and/or quality of life for future residents. The future phases of the regeneration of the Estate provide the opportunity for detailed design to be configured to ensure the lowest practicable levels are achieved in creating a high quality residential environment both internally and externally and, where required, mitigation will be planned in. It is therefore considered to comply with NPPF 185, LP Policy D14, LPP1 Policy EM8 and LPP2 Policy DMT1 and DMT2.

Detailed First Phase

6.385. The submitted Noise Assessment has considered both the internal and external noise environments for future residents of the Detailed First Phase during occupation. This includes the residential units based on the submitted Proposed Floorplans and the proposed private and communal (private) amenity areas that will serve these.

- 6.386. The northern building footprint of Block A has been set back off Pump Lane to ensure that through a design-led approach to layout and block configuration, residential units which front onto the adjacent highway are protected as far as possible. This will be supplemented by a notable landscaped buffer at ground floor which will include new street trees and provide a means of further reducing the exposure of residential units to the noise levels from this primary receptor.
- 6.387. In terms of the internal living environments of the residential units, the assessment therefore confirms that with commensurate mitigation (in relation to glazing specification and alternative ventilation such as trickle ventilation), the Proposed Development can proceed in a way which provides an acceptable noise climate for future residents. It is noted that closed windows with alternative ventilation will control noise levels in the interest of securing desired residential amenity. However, the assessment is clear that windows will be openable and therefore it will be at the residents' discretion as to whether to accept slightly higher internal sound levels. Overall, and when compared to the existing living environment on the Site where residents do not benefit from in-built mitigation, it is considered that the Proposed Development will result in substantially improved residential amenity.
- 6.388. Private balconies and gardens in close proximity to Pump Lane will exceed the upper guideline value for such external amenity areas. As such, no balconies are proposed on the elevation of Block A fronting Pump Lane and the design of the blocks has sought to ensure private amenity space is located away from the primary noise source, on the western and eastern facades so as to not directly face Pump Lane. Only balconies at the northern end of Blocks A and B, closest to Pump Lane, may experience noise levels marginally above the guidance criteria. However, this is not considered to be unusual in such a location and residents benefit from access to communal (private) amenity area located centrally between Blocks A and B, which is expected to be within the relevant criteria of BS8233 and, therefore, overall the external sound levels are expected to meet the upper guideline value.
- 6.389. Given, the urban setting of the Site and location of Blocks A and B closest to a main transport route, such noise levels are expected for external amenity spaces and the BS8233 guidance is clear that it should be a compromise between elevated noise levels and other factors such as making the efficient use of land. Thereby, such spaces should be designed to achieve the lowest practicable levels but development should not be prohibited where this is not possible throughout.

6.390. On the basis of the above, it is considered that the Proposed Development will not result in any residual significant or other adverse impacts on the health and/or quality of life for future residents. Blocks A and B have been designed to mitigate integrated measures to ensure the lowest practicable levels are achieved in creating a high quality residential environment both internally and externally. It is in turn, important to note that the Site currently provides residential homes and the submitted assessment concludes that the development continues to be suitable for such use. It is therefore considered to comply with NPPF 185, LP Policy D14, LPP1 Policy EM8 and LPP2 Policy DMT1 and DMT2.

Fire Strategy

6.391. LP 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.

6.392. In line with the above, from 1 August 2021, the Government introduced further guidance on fire safety and high rise buildings which must be considered as part of the planning process, this is known as “Planning Gateway One”. Where development comprises a “relevant building”, as defined by the guidance, a Fire Statement must be submitted as part of any relevant planning application setting out the fire safety considerations specific to the development proposals and the Health and Safety Executive should be established as a statutory consultee on the application.

6.393. There are a limited number of exemptions set out under the Planning Gateway One guidance which includes applications seeking outline planning permission. This HPA contains part Outline, part Detailed and within the Detailed First Phase, a “relevant building” as defined as 7 or more storeys in height (or 18+ metres) is proposed.

- 6.394. Therefore, in accordance with the LP Policy D12, an Outline Fire Strategy has been submitted in respect of the Outline Area. It identifies the principles that should be applied to any future RMA to ensure all buildings achieve the highest standards of fire safety in compliance with the criteria set out under this policy.
- 6.395. In accordance with the LP Policy D12 and Planning Gateway One, a Fire Statement has been submitted as part of this HPA to address the requirements in relation to the Detailed First Phase. This provides details on the design and materiality of Blocks A and B, and how they have been configured in accordance with Building Regulations.
- 6.396. This confirms that the buildings and layout of the Detailed First Phase, to include access and servicing arrangements have been designed to ensure that the Proposed Development will satisfy the criteria set out under LP Policy D12 and the further guidance and therefore ensure the safety of all future residents and users.

7. Unilateral Undertaking Heads of Terms

7.1. In assisting in the delivery of new homes the NPPF and PPG recognise that conditions or planning obligations may be required to make development acceptable and mitigate what might otherwise be unacceptable impacts on the surrounding area. However, NPPF 55 states that “*planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.*” As such, planning obligations must only be sought where they meet all of the following tests as set out at NPPF 57:

- I. necessary to make the development acceptable in planning terms;
- II. directly related to the development; and
- III. fairly and reasonably related in scale and kind to the development.

7.2. This is in accordance with Regulation 122(2) of the CIL Regulations 2010 (as amended), which puts into law the need for planning obligations to be directly related to development.

7.3. The above tests should inform negotiations with LBH LPA on the scale and form of any planning obligations required in association with the Proposed Development. LPP2 Policy DMCI7 outlines the type of planning obligations commonly sought in association with new development and is clear that this is derived on a scheme by scheme basis. This is supplemented by LBH’s “Planning Obligations” SPD (July 2014). Together, and as identified through the pre-application consultation process with LBH LPA, these indicate that the Heads of Terms (“HoTs”) are likely to include the following, subject to further consultation with and LBH LPA Officers during determination:

- Affordable Housing – to secure provision proposed on-site as part of the Proposed Development;
- Canal-side Public Realm Enhancement – to secure the improvements proposed on-site as part of the Proposed Development;
- Canal Towpath/Canal and River Trust – to secure a financial contribution and management scheme for the proposed towpath improvement works;
- Employment Training Initiatives – to secure an appropriate employment strategy or financial contribution to positively contribute to specific identified local employment issues;

- Construction Training – to secure an appropriate financial contribution towards employment and training during the construction phase;
- Highways and Access Works – to be secured through a S278 Agreement;
- Car Parking – to secure an allocation and management scheme;
- Refuse and Deliveries – to secure a management scheme; and
- Travel Plan – to secure travel planning and on-going monitoring to include car club commitment for up to 5 vehicles on-site.

7.4. The draft HoTs above do not assign the financial contributions associated with the obligations as these will be subject to detailed discussions with LBH LPA having regard to the scale and relative impact of the Proposed Development and Regulation 122 of the CIL Regulations 2010 (as amended). This is in the interest of ensuring these are necessary and reasonable in accordance with NPPF 57.

Community Infrastructure Levy

- 7.5. LPP2 Policy DMC17 states that “*planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL)*”.
- 7.6. LBH LPA adopted its CIL Charging Schedule on 10 July 2014 and identifies a rate of £95 per square metre for residential development.
- 7.7. In addition, LBH LPA is a collecting authority for the Mayor of London's CIL which establishes a rate of £60 per square metre on the basis of the Mayoral CIL2 charging schedule which came into force on 1 April 2019.
- 7.8. In line with the above, an additional information request form has been completed and submitted as part of this application. It confirms the CIL chargeable floorspace of the proposed development, including the amount of existing floorspace to be demolished as part of the proposal.

8. Planning Benefits and Conclusion

8.1. This Planning Statement has been prepared in support of proposals for the comprehensive regeneration of Hayes Town Centre Estate within the London Borough of Hillingdon.

8.2. This application seeks planning permission for:

“Development in outline (with all matters reserved) for residential floorspace (Class C3) to comprise: demolition of all existing buildings and structures; erection of new buildings; provision of a community centre (up to 140 sqm of Use Class F2(b) floorspace); new pedestrian and vehicular access; associated amenity space, open space, landscaping; car and cycle parking spaces; plant, refuse storage, servicing area and other works incidental to the proposed development; and

Detailed planning consent for Blocks A and B comprising 80 residential units (Class C3); new pedestrian and vehicular access; associated amenity space and landscaping; car and cycle parking; refuse storage, servicing area, and other associated infrastructure to include temporary highways and landscaping works” (“the Proposed Development”).

8.3. The Site currently comprises the Hayes Town Centre Estate. This comprises principally of medium rise blocks of flats and maisonettes/duplexes at a height of 3-4 storeys, with a high-rise element of 15 storeys, known as Skeffington Court, located within the south eastern part of the Site. The existing Estate was built in the 1970's and is in need of significant refurbishment. The submission of this application follows extensive consultation with existing residents who have agreed to the Estate renewal process. Alongside this, extensive consultation has taken place with the LBH LPA, the GLA, TFL, and other key stakeholders including the local community.

- 8.4. This HPA is being submitted as a hybrid proposal which seeks permission for development of 500 units overall. It comprises elements in detail (“the Detailed First Phase”) and in outline (“the Outline Area”). The detailed element comprises 80 units and the outline component (appearance, landscaping, layout and scale, and access reserved) for the development of 420 units including car and cycle parking and open space. These elements are defined on Parameter Plan 2, whereby the area within the dotted red line comprises the Detailed First Phase and the remainder of the Site, within the solid red line boundary comprises the Outline Area.
- 8.5. The Proposed Development will deliver a total of 500 residential units, including the re-provision of 199 social rent affordable units, plus 40 additional London affordable rented homes, and 261 new private homes. The existing 115 square metre community room will be replaced with up to 140 square metres of community floorspace. The Proposed Development will also provide extensive new open space that forms an integral part of the redevelopment proposals including the provision of 4,803 square metres of public open space, public realm and landscaping, 1,950 square metres of communal (private) amenity space across podium gardens and ground floor courtyards, as well as 5,320.5 square metres of private amenity space.
- 8.6. The HPA has been submitted following extensive consultation and engagement with residents of the Estate and the wider community, LBH LPA Officers, GLA Officers, TFL and other key statutory consultees and stakeholders. The Proposed Development, as submitted, has evolved to take account of this process and also having regard to the relevant national planning policy guidance, the Development Plan and other material considerations. This is evident through the Illustrative Masterplan and the design principles contained within the submitted Design and Access Statement.
- 8.7. This Planning Statement demonstrates that the proposed comprehensive regeneration of the Hayes Town Centre Estate has been carefully considered in accordance with Hillingdon’s Local Planning Policies and the LP (March 2021), and other material considerations to include the NPPF (July 2021) and the Mayor’s Good Practice Guide to Estate Regeneration (February 2018), as well as the needs of the existing community living on the Estate.

- 8.8. The existing housing stock on the Estate does not meet the housing needs of current residents. The existing condition and quality of this also highlights key issues to include a lack of private amenity space as well as safe usable public open space, inefficient residential unit layouts and poor performing living environments in terms of energy and acoustics. The layout and design of the existing Estate is also poor, representing an inefficient use of the Site. The regeneration of the Estate therefore recognises these issues and will optimise the opportunity to deliver sustainable development which will bring with it significant planning and socio-economic benefits.
- 8.9. The Proposed Development will provide a range of planning benefits for the Site and surrounding area, as set out below:
- I. Optimisation of an existing residential Estate which is highly accessible, located in a defined Town Centre, Opportunity Area and Housing Zone. In accordance with national, regional and local planning policy, the Proposed Development will make efficient and effective use of this Site, facilitating replacement and additional housing delivery of high quality new homes alongside community floorspace, new and enhanced public open space to include a Community Square and improved pedestrian and cycle routes.
 - II. Demolition of the existing low quality Estate and redevelopment to provide new high quality affordable housing (51.7% by floorspace) which responds directly to the needs of existing and returning residents. It will comprise the delivery of safe, secure and larger affordable accommodation that provides well laid out family homes that are adaptable to meet the changing needs of the returning and future residents.
 - III. The Proposed Development will include a meaningful provision of market housing (261 units) to subsidise the aspirations of estate renewal with a total of 500 new homes constructed across the Estate. The new homes are sustainable, inclusively designed within an environment that is well-considered, design-led and will include usable landscaped open space and public realm for private and shared amenity. This will contribute to the creation of a more diverse, mixed and balanced community.
 - IV. The Proposed Development will provide a range and mix of high quality open spaces, including communal podium gardens, ground floor courtyards, a new community square, as well as

children's play areas in accordance with guidelines and aspirations set out in both the Mayor's and LBH's open space and play space standards. The proposed landscape strategy will increase the ecological and urban greening of the site and will contribute to local biodiversity gain.

- V. The Proposed Development will provide high standards of accommodation containing no north facing single aspect units, and minimises the amount of single aspect units. The development will provide 76% dual aspect units.
- VI. Car parking is proposed at a level compliant with LP standards having regard to the needs of returning residents as part of the Landlord's Offer and encourages sustainable modes of transport with improved pedestrian and cycle routes as well as the policy compliant provision of secure cycle parking for residents and visitors.
- VII. The Proposed Development has been designed to achieve net- carbon dioxide emissions through on-site interventions.
- VIII. The Proposed Development will also generate a significant Community Infrastructure Levy (CIL), to be used for the funding of local infrastructure requirements and a number of construction and permanent jobs will be generated as a result of the Development.
- IX. The permission would also be subject to Unilateral Undertaking which will secure the provision of affordable housing, public realm improvements along the Canal and a range of other potential contributions directly related to the Development and CIL Regulation 122 compliant.

8.10. Notwithstanding the above, an Economic Impact Assessment (incorporating a Social Value Assessment) has been prepared by Savills Economics and forms part of the HPA (as enclosed at Appendix 3 of this Planning Statement). The analysis identifies a number of significant economic and social value benefits arising from the Proposed Development (inclusive of the Detailed First Phase) including:

- I. The Proposed Development will increase the number of economically active residents in the area, including key workers. This will reduce unemployment, increase average incomes; increase the skills of the local population; and increase the proportion of spending retained in the local service economy, contributing to sustainable development.

- II. The improved layout and accessibility to open space address the need for public open space and health benefits to residents of the Site and the immediate surroundings. These help address key health and well-being issues identified in on-going consultations with existing residents at the Estate.
- III. An improved living environment, through the delivery of higher quality housing, will also help address issues such as overcrowding; ease concerns over deprivation; and reduce poverty levels for the most vulnerable groups, such as children and pensioners, as identified in the analysis.
- IV. An increase in the quality, mix and supply of housing will provide housing opportunities for existing residents. The inclusion of different types of homes including one, two and three bedroom flats, maisonettes and houses will help meet a diverse population's needs and resolve issues such as overcrowding in Hayes Town Centre Estate.
- V. The Proposed Development will also promote greater levels of health and well-being benefits for residents, arising from a safer living environment. More energy efficient housing will help alleviate fuel poverty, and contribute to improved physical and mental health.
- VI. The Proposed Development will help unlock further renewal of the wider area, improving employment prospects and revitalising the local economy.
- VII. The Proposed Development will increase employment opportunities, as follows:
 - a. 80 FTE gross construction jobs per annum, generating around 650 construction jobs over the duration of the demolition and construction process;
 - b. 20 FTE off-site construction jobs;
 - c. 150 FTE on and off-site operational jobs, to include an uplift of around 80 on and off-site jobs of which 40 will be on-site; and
 - d. 12 FTE additional jobs generated within the borough in the retail, food and beverage sectors.

- VIII. The Proposed Development is likely to support £4.03m net additional Gross Value Added per annum benefitting the local economy.
 - IX. The Proposed Development is likely to generate estimated council tax revenue of £370k per annum based on the net uplift in residential units.
 - X. The proposed uplift in residential units is also expected to generate a total new household expenditure of around £2.85m per annum, of which around £2.10m will be retained within the borough.
 - XI. The development brings other benefits including New Homes Bonus; planning obligations, to include financial contributions (where justified) and CIL receipts will also be available for LBH LPA to bring forward funding for new facilities or to enhance existing social infrastructure in the area; and other benefits such as the provision of new community floorspace, public open space, communal (private) amenity space and private amenity space, and improved connectivity to existing facilities and public transport.
- 8.11. The Planning Statement has assessed the material considerations arising from the Proposed Development against the prevailing planning policy framework and has demonstrated that it complies with the relevant national, LP and local planning policy guidance. It is therefore respectfully requested that the proposals are recommended for approval.

Appendix 1

Red Line Site Location Plan

GENERAL NOTES:
This drawing is © 2020 Pollard Thomas Edwards LLP (PTE).
Use figured dimensions only. **DO NOT SCALE.**

All dimensions are in millimetres unless noted otherwise.

This drawing must be read in conjunction with all other relevant drawings and specifications from the Architect and other consultants.

If in doubt, ask.



-  Red Line for Hybrid Planning Application
-  Phase 1 Definition Red Line as part of Hybrid Planning Application

rev	date	description	drawn	audited
C2	09/12/21	PLANNING ISSUE	MR	LB

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project	job no.	drawn	scale	date created
Hayes Town Centre Estate	19-100	EB	1 : 1250@A3	Dec '21

drawing title	drawing number	revision	status
Red Line Site Location Plan	HTC-PTE-ZZ-XX-DR-A-10004	C2	S2

Appendix 2

Pre Application Consultation Summary



Pre-application Feedback – Hayes Estates

These records relate to the main pre-application meetings only between the Applicant team and LBH and GLA Officers. The below tables do not include the various technical meetings/ workshops held between the Applicant Team and specific Officers on dedicated technical areas. For a detailed list and further information regarding these technical meetings, please refer to paragraph 3.14 in Section 3 of the respective Planning Statements dealing with consultation and engagement for each Estate.

Hayes Town Centre Estate

Key Topics of Discussion	Officer Feedback Received	Applicant Design Response
Pre-app 1 LBH: 16/06/2021 GLA: 27/07/2021		
Separation Distances	<ul style="list-style-type: none"> LBH Design Officers commented that there was a 16m distance between Block I and the locally listed building on Silverdale Road. Requested further consideration of separation distances between proposed blocks (I/J) and the locally listed building to the east as well as those blocks adjacent to Crown Close to ensure these do not blight the future development/conversion of either neighbouring site. 	<ul style="list-style-type: none"> Increase in width of Silverdale Road Slight re-alignment of southern blocks to achieve an average separation distance of 21m between Blocks I & J and the locally listed building to the east. Redistribution of nine residential units as a result of the reconfiguration of Block H, resulting in an additional storey on three of the more central blocks fronting Austin Road, increasing these from 5 storeys to 6 storeys.
Balcony Strategy/Canal Treatment	<ul style="list-style-type: none"> LBH and GLA Officers requested further details regarding how the balconies are treated (e.g. inset balconies or protruding). Especially along canal frontage and in addressing character of the canal. Indicative cross section/levels would help in assessing these elevations and how this sits alongside Western View, to include balcony treatments. 	<ul style="list-style-type: none"> Details on the balcony strategy provided as part of identifying maximum block parameters (to include potential for recessed approach on the eastern and southern elevations of the Blocks J, I & H) and typical unit layouts/floorplans of Block J in particular, to demonstrate no overlooking or loss of privacy for any future residential conversion of the adjacent locally listed building to the east.

<p>Mews Properties</p>	<ul style="list-style-type: none"> • LBH Officers commented that in regards to the Mews houses along Austin Road, it is important to consider the impact on the trees towards Little Road and any potential impacts on the proposed Mews houses. • Requested that the architects provide precedents to show how the mews terraces will sit alongside the existing residential terraces of Little Road (i.e. will have a positive impact, provide a secure boundary line, achieve adequate separation distances/minimise overlooking). 	<ul style="list-style-type: none"> • Adjusted layout of the Mew Houses in giving further consideration to separation distances with the existing gardens and properties on Little Road. This included the breaking up of the massing and ensuring a minimum 20m distance between the proposed buildings and the properties of Little Road • This was informed by Middlemarch's submitted Preliminary Arboricultural Assessment in considering the amenity value of retained trees and RPA matters.
<p>Internal Podium Courtyards</p>	<ul style="list-style-type: none"> • GLA Design Officers commented that with regards to the internal podium courtyards, it is important to demonstrate that the provision of communal amenity space is useable and meaningful and that overall the block and unit configuration does not result in adverse impacts by way of overlooking or loss of privacy. 	<ul style="list-style-type: none"> • A review of separation distances and outlooks across internal courtyards within the proposed perimeter blocks was conducted. • Sections showing the relationship between units and adjoining external amenity space at ground and first floor podium level were provided. • Sunlight and daylight testing (undertaken by eb7) also informed this design review (as detailed further below).
<p>Pre-app 2 LBH: 27/08/2021 GLA: 01/09/2021</p>		
<p>Block G – J Internal Separation Distances</p>	<ul style="list-style-type: none"> • LBH Officers raised concerns about the distances across the courtyards between Blocks G, H, I and J particularly where only 9.5m and 11.7m at the corners. • Recommended that the configuration of these blocks is reviewed further to understand whether there are opportunities for widening the gaps, 	<ul style="list-style-type: none"> • The indicative orientation / layout of units and configuration / positioning of Blocks G and H was revised to increase separation distances, ensuring a minimum 15m separation distance can be achieved between the blocks in line with LBH's Design and Accessibility SPG (July 2006) and preventing overbearingness.

	<p>moving Blocks G and H further west and/or re-configure unit layouts.</p>	<ul style="list-style-type: none"> Review of Blocks J and I to maintain average 21m separation distance with the locally listed building and provide clear visual and physical link to the canal.
<p>Mews Layout and relationships with Tree RPA's</p>	<ul style="list-style-type: none"> LBH Officers asked that an overlay is provided which shows how the Mews blocks sit in relation to the RPAs of the trees along the eastern boundary and in the gardens of the adjacent Little Road properties. GLA Design Officers suggested that the mews houses and their relationship with existing properties on Little Road needed to be explored further to identify what they look like from rear/adjoining neighbours. Raised the need to understand any potential concerns regarding privacy and outlook, in particular from the proposed roof terraces in terms of overlooking. GLA Officers stated that along the edge of Crown Close there are 25 new trees and that these are outside of site boundary but not shown for retention or removal in the Preliminary Arboricultural Assessment. Identified that proposals will need to confirm what the plans are for these trees. 	<ul style="list-style-type: none"> Detailed study of and re-configuration of the Mews houses to improve their relationship with the adjacent properties of Little Road, respond to the Root Protection Areas (RPAs) of existing trees and reduce heights along this eastern boundary to a consistent two storeys. Provision of an overlay showing the layout of the Mews properties in relation to the relevant RPAs and tree canopies. Further daylight, sunlight and overshadowing testing with a focus on podium communal amenity spaces within the scheme and initial assessment of parameters on neighbouring properties, to include amenity areas and the locally listed building to the east. Development of the tree retention, removal and replacement strategy following initial site visit with LBH Landscape and Arboriculture Officers.
<p>Phase 1 – Pump Lane Frontage</p>	<ul style="list-style-type: none"> LBH Officers commented that Pump Lane is an important frontage and asked whether the cycle store is best placed here at the north western end of Block A or whether an active frontage would work better. 	<ul style="list-style-type: none"> Detailing of the treatment of corners and elevations onto the street was amended to maximise this frontage onto Pump Lane. Architects reviewed and proposed a double height entrance on north eastern edge of Block A which will provide a point of arrival and looking at treatment of the

	<ul style="list-style-type: none"> GLA Officers queried whether potential to reconfigure this part of the Block, reduce the size of the cycle store and/or provide another entrance. 	<p>street elevation fronting Pump Lane to provide some visual interest.</p>
<p>Canal Frontage and Elevational Changes</p>	<ul style="list-style-type: none"> LBH Officers noted that the current ramp at the eastern end of the Site, leading onto Western View is proposed to be removed as part of the Silverdale Industrial Estate scheme and be replaced with a publically accessible lift. Recommended that as part of the story supporting the proposals for the southern part of the Site fronting the canal and towpath, PTE should demonstrate how the existing building line against the canal edge has been retained and will transform relationship with Western View. This is in justifying the building configuration and footprint. GLA Officers stated that in regards to the relationship of the canal frontage with proposed buildings and change in levels, the proposals will need to make clear how there is inclusive access to all areas. Also identified that it was important to note that the consented Silverdale scheme to the east has proposed a staircase (and public lift) up from canal and that this needs to be reviewed in parallel with the emerging estate proposals to ensure a coordinated approach. 	<ul style="list-style-type: none"> Further illustrative massing studies prepared for the southern part of the site, to show level changes and integration of proposed buildings as part of a new frontage onto the canal. Landscaping provided as a physical buffer as well as a means of screening for the sunken parking area of Block H. This is in addition to recessed brickwork as the proposed elevational treatment.
<p>Play Space</p>	<ul style="list-style-type: none"> GLA Officers noted that the proposed play space provision represents a shortfall overall to include older children play and asked whether the team has explored removing the on-street car parking 	<ul style="list-style-type: none"> Development of play and informal recreation space strategy alongside wider landscaping strategy.

	<p>and roads from the East-West streets to make them linear pedestrian streets with increased play space.</p> <ul style="list-style-type: none"> GLA Design Officer stated that if the deficit cannot be made-up then this will have to be re-provided elsewhere. 	<ul style="list-style-type: none"> Landscape consultant developed a play space strategy that took into account private gardens as part of doorstep play provision. Also incorporated the 800sqm of ground floor/podium level space in the form of private communal gardens to provide additional doorstep play.
Energy	<ul style="list-style-type: none"> GLA Energy Officer recommended Synergy engage with LBH on potential connections to a nearby or planned (where feasible) district heating network / approach to a site wide heating network first as GLA officers will want evidence that discussions have taken place with LBH on feasibility. 	<ul style="list-style-type: none"> Agreement of preferred energy option and testing of this against emerging proposals, to include an initial overheating assessment.
<p>Pre-app 3 LBH: 27/09/2021 GLA: 12/10/2021</p>		
Crown Close	<ul style="list-style-type: none"> LBH Officers suggested that the proposed alterations to Crown Close, making it one-way in order to provide an extensive green buffer along this western boundary, was potentially a significant planning risk which would require consultation with bus operators and other stakeholders. 	<ul style="list-style-type: none"> Separate LBH Highways meeting conducted in which it was confirmed that Crown Close would remain two-way. The northern section of Crown Close was made two-way to allow delivery vehicles servicing the Argos/Iceland/Wilko loading bay to be able to turn and head back to Pump Lane and the Hayes bypass without having to travel through the town centre.
Eastern Elevations of Blocks J – I	<ul style="list-style-type: none"> GLA Officers commented that the eastern elevation of Blocks J and I is long and suggested that a 'kink' in the building line could be incorporated to break up the massing. 	<ul style="list-style-type: none"> The design team looked in detail on the articulation of blocks J and I elevation in creating variations in horizontal/vertical emphasis and using materiality to break up perception of massing along this particular frontage given also its wider landscaping and public realm context leading the Canal-edge.

Appendix 3

Economic Impact Assessment (incorporating a Social Value Assessment)

1. Economic Benefits

1.1. Introduction

- 1.1.1. The Economic Benefits and Social Value Assessments aim to quantify the true impact of the Proposed Development. This includes estimating the number and type of jobs generated during both the construction and operational phases, future residential expenditure, Gross Value Added (GVA) to the local economy and potential new public sector revenues. In the Social Value Assessment we estimate the value generated from the reuse and redevelopment of the Subject Site in terms of reducing unemployment, promoting skills via apprenticeships, health benefits and quantifying the benefits of providing new enhanced public realm. This represents the additional wider social, economic and environmental benefits that would be generated by the Proposed Development.
- 1.1.2. Impacts may be direct or indirect. The effects during construction are anticipated to be short to medium term in duration (temporary), while effects during operation are anticipated to be long term (permanent), unless otherwise stated.
- 1.1.3. Overall the proposed development is anticipated to generate significant economic benefits and social value uplift, and is considered beneficial for the local economy.

1.2. Employment Impacts

- 1.2.1. The proposal is expected to generate temporary jobs during the construction period and permanent jobs at the operational stage.

1.3. Construction Jobs

- 1.3.1. We have used the construction cost estimate (which includes demolition costs) produced by Martin Arnold Ltd. We have also used data on the output per construction worker in Greater London area¹ to estimate the number of construction jobs that may be generated by the proposed scheme. As indicated, the construction period is expected to last around eight years.

Table 1.1: Indicative Construction and Delivery Programme

Proposed Development Phase		Start date	Finish date
Construction of Phase 1 (Blocks A and B)		Autumn 2022	Summer 2024
Outline Area	Phase 2 (Blocks C and D)	Autumn 2024	Summer 2026
	Phase 3 (Blocks E and F)	Summer 2026	Spring 2028
	Phase 4 (Blocks G, H, I and J)	Spring 2028	Spring 2030
	Phase 5 (Mews Houses)	Spring 2028	Autumn 2029

Source: Savills, 2021.

- 1.3.2. We estimate that the construction phase will generate around 650 construction job years over the duration of the construction process. This equates to an average of around 80 FTE gross construction jobs per annum for the proposed scheme (rounded to the nearest 10). This is referred to in the Additionality Guide (HCA, 2014) as the 'gross direct' employment and can be considered as the number of workers on-site, on average, throughout the construction period. The precise numbers will depend on the phase of work and specific construction activities on-site. During the peak of construction activities the on-site workforce is expected to be larger.
- 1.3.3. We have also estimated how much of this employment is likely to be taken up by residents of LBH. We assume that 53% of the construction workforce will live outside LBH². We anticipate a low level of displacement (25%) from existing construction projects this is based on the Additionality Guide (HCA, 2014) recommendations and

¹ Business population estimates for the UK and regions (2018) Department for Business, Innovation and Skills.

² This assumption is based on the 'Distance Travelled to Work by Industry (Workplace Population)' based on Census 2011 data.

market reports³. We then apply a multiplier of 2.03⁴ which provides an estimate for the indirect construction employment effects (offsite benefits down the supply chain and from expenditure by the workers in the local area). **Table 1.2** presents the estimated total on and off site construction jobs created by the demolition of the reference case and construction of the proposed development. The demolition and construction phases are expected to support around 60 total net construction jobs for residents of LBH per year for the duration of the construction period.

Table 1.2: Estimated Construction Phase Jobs

	Proposed Scheme
Gross Direct Construction Jobs per annum	80
<i>Leakage (53%)</i>	40
Onsite Jobs (for residents of LBH)	40
<i>Displacement (25%)</i>	10
<i>Multiplier (2.03)</i>	30
Offsite Construction Jobs	20
Net Direct and Indirect Construction Jobs per Annum (rounded)	60

Source: Savills, 2021. (Figures may not sum due to rounding)

1.4. Operational Jobs

- 1.4.1. Operational jobs will be created from the community floorspace and through homeworking. No measureable increase in employment is anticipated due to the increase in community floorspace provision however the number of homeworkers is expected to increase. To estimate the level of homeworking, we have used the average percentage of the working age population who work from home in Greater London (14%)⁵ and the anticipated population of the existing and proposed developments. It is estimated there are around 40 existing homeworkers. The proposed development is estimated to accommodate around 80 full-time equivalent ('FTE') homeworkers meaning there is anticipated to be a net uplift of 40 FTE homeworkers as a result of the proposed development.
- 1.4.2. We include an estimate of the total net local employment effects after taking into account multiplier effects (1.59 multiplier effect⁶). **Table 1.3** summarise the estimated operational jobs created onsite.
- 1.4.3. We estimate the proposal would generate a total of 80 gross on-site jobs. Once multiplier effects have been taken into account, the proposed scheme is estimated to generate 150 on and off-site jobs. This represents a net uplift of around 80 on and off-site jobs of which 40 will be on-site.

Table 1.3: Estimated Operational Jobs (FTE)

Land Use	Proposed Development	Existing Development	Net Additional Operational Jobs
Gross Operational Jobs (Direct)	80	40	40
<i>Multiplier (Residential 1.59)</i>	60	30	30
Total Jobs (Direct & Indirect)	150	70	80

1.4.4. Source: Savills, 2021. (Figures may not sum due to rounding).

- 1.4.5. We also analysed the average household expenditure and the spending retention rates for the retail and food/beverage sectors in LBH. This allowed estimation of the total new household expenditure per annum associated with the proposed development. To estimate this, the average household expenditure in LBH was multiplied by uplift in households (240).

³ CITB Construction Skills Network 2021-2025.

⁴ ONS, Input Output Analytical Tables, 2017.

⁵ ONS Characteristics of Home Workers (2014).

⁶ ONS Input Output Analytical Tables (2017) to estimate multiplier effects.

- 1.4.6. The new retail and food and beverage expenditure introduced to LBH per annum was then divided by the average turnover per employee in each sector to estimate the number of jobs generated in each sector.
- 1.4.7. Based on an 88% retention rate for convenience goods, 56% retention rate for comparison and 88% for food and beverage goods, the proposed uplift of 240 residential units is expected to generate a total new household expenditure of around £2.85m per annum of which around £2.10m will be retained within LBH. This a high-level assessment that assumes the replacement homes are like for like in terms of unit type, household size etc. In reality, the actual net uplift in local retail expenditure could be significantly larger.
- 1.4.8. **Table 1.4** lists the number of jobs likely to be generated as a result of the new expenditure from the future residents of the proposed development. Overall, around 12 FTE additional jobs are expected to be generated in LBH in the retail, food and beverage sectors.

Table 1.4: New Household Expenditure Impacts

Sector	Residential Expenditure and Jobs (FTE)
New retail expenditure introduced to LBH per annum	£1.56m
Retail jobs generated	3
New food and beverage expenditure introduced per annum	£0.54m
Food and beverage jobs generated	9
Net direct and indirect operational jobs induced by new residential expenditure	12

Source: Savills, 2021. (Figures may not sum due to rounding).

1.5. Gross Value Added

- 1.5.1. GVA is an indicator of wealth creation that measures the contribution to the economy of economic activity associated with the operation of the proposed development. We have based our estimates on the GVA generated per worker in the Greater London⁷ and the number of operational jobs created which are presented in **Table 1.3** above.
- 1.5.2. **Table 1.5** presents a summary of our GVA estimates. It shows that the proposed development is estimated to generate approximately £4.03m per annum in additional GVA (rounded to nearest £10k), benefiting the local economy.

Table 1.5: Estimated GVA per Land Use Type, £000s

Use Type	Proposed Scheme	Reference Case	Net additional
Residential ⁸ (Homeworkers)	£8.67m	£4.64m	£4.03m

Source: Savills, 2021. (Figures may not sum due to rounding).

1.6. Public Sector Revenues

- 1.6.1. The proposed development will generate public sector revenues which can be re-invested in the community and local services. The estimate provides figures based on current rates and values. The estimated revenues could be significantly higher in real terms given anticipated growth in the economy over time.

1.7. Council Tax

- 1.7.1. To estimate the council tax income of the existing market housing we used the average council tax rates in LBH for properties in bands B, C and D properties. This reflects the quality and value of the existing stock. The estimated council tax revenue from the existing market housing is expected to be around £90k per annum, disregarding any discounts that may be applicable.

⁷ Reported by Greater London Authority (GLA) Economics for 2015.

⁸ Sectors used to estimate homeworkers GVA are; information and communication, real estate, professional scientific and technical, and administrative and support services.

1.7.2. To estimate the council tax income of the proposed development we used the average council tax rates in LBH for properties in bands D and E properties. The estimated council tax revenue from the market housing is expected to be around £460k per annum, disregarding any discounts that may be applicable. This represents a potential net uplift in council tax revenues of around £370k per annum.

1.8. Section 106 / 278 Contributions

1.8.1. The proposed scheme will generate S106 contributions which at this stage are not confirmed. In total an allowance of £250,000 in S106 / S278 financial contributions has been made which have been worked up in collaboration with the Council. This includes the implementation of Canal edge public realm and highway improvements which the Applicant is expected to undertake within the red line boundary. The exact S106 / S278 financial contributions will be discussed in detail with LBH LPA and the Applicant in considering impact, mitigation and enhancement and within the wider context of CIL Regulation 122 compliance. Any financial contributions made can provide further improvements to the local area.

1.9. Community Infrastructure Levy ('CIL')

1.9.1. Savills Planning estimated CIL relevant to the proposed development which has been used in this assessment of economic benefits. The total CIL estimate for the proposed development is £2.64m.

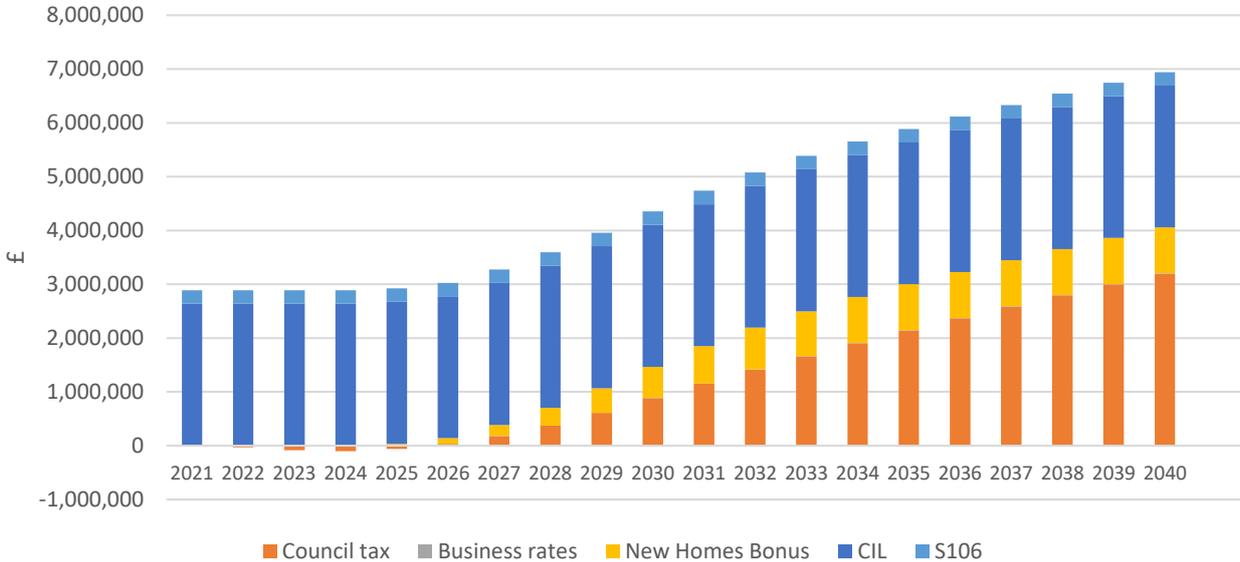
1.10. New Homes Bonus

1.10.1. With the construction of the proposed development the LBH would receive further income via the New Homes Bonus (NHB). The calculation of the NHB uses the average Council Tax rate in England. The estimated bonus is expected to be £1.14m. The method for calculating NHB is likely to change from 2022/2023. Consequently, the estimate for NHB is indicative.

1.11. Cumulative Public Sector Revenues

1.11.1. **Figure 1.1** presents the potential additional cumulative public sector revenues which could be generated by the proposed scheme over the next 20 years. This indicates that by 2040 the proposed development could have generated around £6.9m (NPV) in public sector revenues.

Figure 1.1: 20 Year Net Additional Public Sector Revenues (NPV; Cumulative)



Source Savills, 2021.

*Net Present Value (NPV) discounted at Treasury Green Book rate of 3.5% pa starting 2021.

** Exact S106 / S278 financial contributions are yet to be finalised and so may be subject to change.

***The method for calculating NHB is likely to change from 2022/2023. Consequently, the estimate for NHB is indicative.

2. Social Value Benefits

2.1. What is the Scheme's Social Value?

- 2.1.1. The construction and operational phases of the proposed development are expected to generate positive social value impacts to the community. These include skills and training, employment impacts, local procurement, and health benefits.
- 2.1.2. The Social Value of these community benefits have been estimated using Social Value proxies from the National Themes, Measures and Outcomes (TOMs) by the Social Value Portal. Given that TOMs proxies are estimated at the UK level, they have been locally adjusted to LBH using the mean weekly pay in the UK and the borough, as per the Annual Survey of Hours and Earnings.

2.2. Construction Benefits

- 2.2.1. The construction phase is expected to provide a range of community benefits related to skills, training, employment creation for local workers and for the unemployed, and to support local firms through local materials and employment procurement. The proposed development will also foster skills and training in the construction sector by supporting apprenticeships, offering opportunities for work experience, and potentially hosting workshops or school visits.
- 2.2.2. The Social Value of these benefits has been estimated using the benchmark published by the National Skills Academy for Construction (NSAfc). Based on estimated construction costs and land use type, the NSAfc's benchmark provide estimates of the duration (in weeks) of apprenticeships, the number (in persons) of work experiences, and the number of career events. TOMs social value proxies complemented our estimates. This is shown in **Table 2.1** below.
- 2.2.3. The provision of 264 weeks of apprenticeships over 9 years of construction will provide opportunities for 6 apprentices. With a value of £255 per person per week, this will contribute to a total social value of around £67,000 over the construction phase. The construction will also provide work experience for 25 people, which at £192 per person will yield a social value of £4,800. Finally the provision of 12 school visits or careers events supported by the scheme would have a social value of £60,000.

Table 2.1 Social Value of Skills and Training Provision during Construction

	Apprenticeships	Work experience	Workshops/School visits
Quantity	6 people	25 people	12 events
Duration	264	-	-
Value	£255 pp/week	£192 pp	£5,000 per event
Social Value p.a.	£67,000	£4,800	£60,000

Source: NSAfc (2016), Social Value Portal (2020), Savills (2021) Note figures are rounded. (Per person (pp)).

- 2.2.4. As outlined previously, the proposed development is expected to generate around 80 temporary on-site jobs during construction. Beyond the benefit of providing jobs, this is estimated to provide additional value, by potentially hiring previously unemployed people, individuals from disadvantaged groups and by providing jobs to local people.
- 2.2.5. **Table 2.2** below summarises the social value of unemployment reduction. This is estimated based on the health benefits of unemployment reduction and the benefits of employing those in disadvantaged groups in society. It has been estimated that the employment of a previously unemployed person reduces healthcare expenditure by £2,410 per job⁹. A 10% unemployment rate for construction workers, based on internal research was assumed. By reducing unemployment, the proposed development is estimated to have a social value of around £17,500 per year during the construction period.
- 2.2.6. It is estimated that the employment of those who are unemployed and pertain to a disadvantaged group (including: the long-term unemployed, veterans, the disabled and homeless individuals) has a social value benefit of around

⁹ House of Commons (2019), NHS Expenditure: <https://commonslibrary.parliament.uk/research-briefings/sn00724/>

£21,600 per job (locally adjusted). It is estimated that 3% of the construction work force would fall into this classification. The social value of this impact is estimated to be around £43,200 in total.

Table 2.2 Unemployment Reduction Health Benefits From Construction Jobs

	Measure
Number of jobs per year	70
Number previous unemployed (10%)	7
Value per job due to NHS savings	£2,410
Social value per annum	£17,500
Number previously from disadvantaged group (3%)	2
Value per job due to NHS savings	£21,600
Social value per annum	£43,200

Source: House of Commons (2019), Savills (2021). (Figures may not sum due to rounding).

2.2.7. Finally, the construction phase of the proposed development is expected to benefit businesses in the area through local procurement, which would add social value. Our estimates assume that 10% of total construction costs will go toward local suppliers. 10% of total construction costs amounts to £13.4m.

2.3. Operational Benefits

2.3.1. The operational phase of the proposed development is expected to create social value and provide community benefits through further NHS savings due to the health benefits associated with the creation of affordable housing and new public realm enhancements.

2.3.2. The estimate for the amount of social value generated by affordable housing is based on the uplift of affordable units (40). The estimated NHS savings associated with the provision of social housing is £135 per unit and the impact it can have in reducing homelessness¹⁰. Assuming a displacement factor of 0.25 generates a social value benefit of £4,050 per annum.

2.3.3. The enhanced public realm that the proposed development comprises includes a new community square, new playspace, upgraded north-south pedestrian/cycle links and improvements to the Site's frontage onto the Canal along Western View and with neighbouring sites. The social value impact of this is estimated using the findings from the Fields in Trust¹¹. This shows that the value of public parks can provide NHS savings of around £3.16 per annum per person. The overall social value benefit of this is calculated by multiplying this figure by the anticipated population generated by the proposed development. In total, the estimated social value generated by the proposed development's enhancements to the public realm is £4,300 per annum.

¹⁰ DCLG, 2016. The DCLG Appraisal Guide.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/576427/16_1129_Appraisal_Guidance.pdf

¹¹ Fields in Trusts, 2018. Revaluing Parks and Green Spaces.

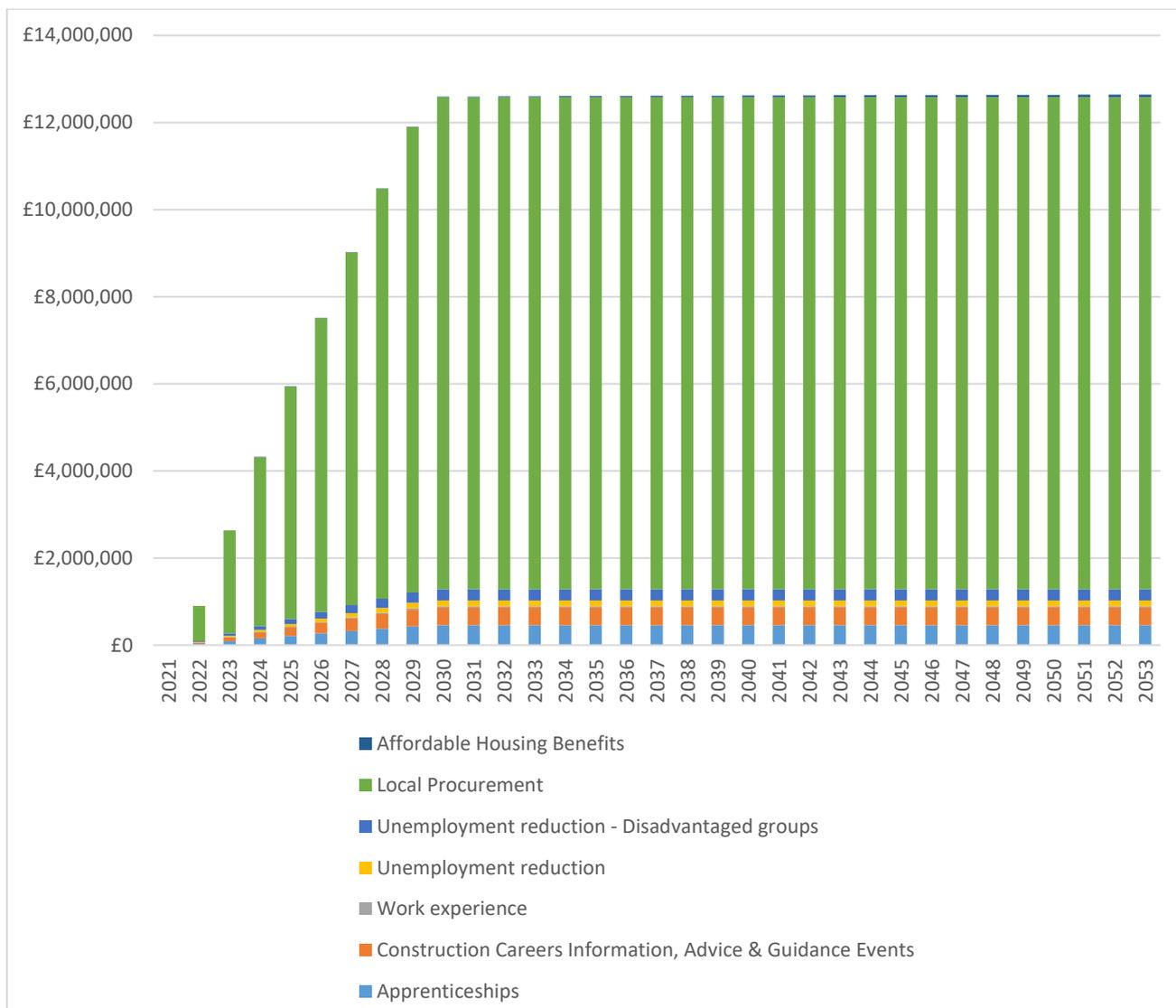
<https://www.fieldsintrust.org/Upload/file/research/Revaluing-Parks-and-Green-Spaces-Summary.pdf>

2.4. Cumulative Social Value Impact: £12.75m Over 30 Years

2.4.1. Having estimated the total social value during the construction phase and the annual social value during the operational phase we estimate the total social value over the development's lifetime. For this assessment we have assumed a period of 30 years. Social value in future years is discounted at an annual rate of 3.5% to obtain the net present value, as per appraisal guideline from HM Treasury's Green Book (2020).

2.4.2. The proposed development is estimated to have a total social value of £12.75m over the next 30 years.

Figure 2.1: 30 Year Social Value (NPV; Cumulative)



(Net Present Value (NPV) discounted at Treasury Green Book rate of 3.5% pa starting 2021.)

3. Economic Benefits and Social Value Summary

Summary

3.1.1. The proposed development is expected to generate significant economic benefits through the creation of temporary and permanent jobs, new residential expenditure and additional public sector revenues. In terms of social value, we estimate that the proposed development will generate a significant uplift in social value by reducing unemployment, promoting construction industry skills development and through local procurement. Overall the proposed development is considered beneficial for the local economy.

Table 3.1 Summary of Economic Benefits

Outcome	Amount
On-Site Construction Jobs Per Annum	80
On-Site Operational Jobs	80
Net Additional Operational Jobs (on-site and off-site)	80
Residential Expenditure (retained in LBH)	£2.10m
Additional Gross Value Added (GVA) per annum	£4.03m
Council Tax Revenue Uplift per annum	£370k
S106 / S278 Agreements	£250k*
New Homes Bonus (NHB)	£1.14m**
Community Infrastructure Levy	£2.64m
20 Year Cumulative & Discounted Income (NPV at 3.5%)	£6.9m

Source: Savills, 2021. (Figures may not sum due to rounding).

* Exact S106 / S278 financial contributions are yet to be finalised and so may be subject to change.

**The method for calculating NHB is likely to change from 2022/2023. Consequently, the estimate for NHB is indicative.

Table 3.2 Summary of Social Value Gain

Indicator	Total SV per annum	30 Year NPV
Construction		
Apprenticeship	£67,000	£510,000
Workshops / school visits	£60,000	£460,000
Work experience	£4,800	£30,000
Unemployment reduction – NHS Savings	£17,500	£130,000
Unemployment reduction – Disadvantaged Groups	£43,200	£290,000
Local Procurement	£1.7m	£11.3m
Operation		
Affordable Housing Benefit	£4,000	£60,000
New Public Realm Benefit	£4,300	£70,000
Total	£1,880,000	£12,750,000

Source: Savills, 2021. (Figures may not sum due to rounding).

Impact of Covid-19

- 3.1.2. Please note that the current Coronavirus crisis will have a major impact on demand and values in the short to medium term. The analysis and conclusions should be considered as potentially relevant to the situation once the UK economy has recovered from the most significant impacts of Coronavirus. It is too early to estimate how the crisis will impact on trends, and for example how strong the rebound will be and to what degree there is a change in the composition of demand and activities in the post Coronavirus crisis world. The analysis in this report should be viewed with this in mind.

Accuracy

- 3.1.3. By its nature estimation of employment and GVA benefits is subject to a range of uncertainties. Our estimates are based on good practice, guidance, data and estimates based on knowledge and experience. There will though remain a degree of uncertainty around estimates. We estimate that actual impacts are likely to be in a range of +/-20% of figures given.
- 3.1.4. Revenue figures are given based on current rates and values and could be significantly higher in real terms given the long timescale before completion and anticipated growth in the economy.

Appendix 4

Equality and Human Rights Impact Assessment



HILLINGDON
LONDON

Equality and Human Rights Impact Assessment

STEP A) Description of what is to be assessed and its relevance to equality

What is being assessed?

The impact of proposed redevelopment on the Hayes Town Centre and Avondale Drive Estates.

Who is accountable?

Perry Scott Corporate Director of Infrastructure, Transport & Building Services

Date assessment completed and approved by accountable person

18th May 2021

Names and job titles of people carrying out the assessment

Vicky Trott, Equality Manager

A.1) What are the main aims and intended benefits of what you are assessing?

In response to concerns raised by residents about building condition and anti-social behaviour on the Hayes Town Centre and Avondale Drive Estates, the council has been exploring ways to improve the standard of residential provision for current residents.

It has also taken into account the opportunity to deliver additional housing supply and a high-quality public realm, which is in line with its planning policies for Hayes town centre, the Hayes Housing Zone and the borough generally.

The redevelopment of the estates will provide positive opportunities for existing residents and the wider community including those with protected characteristics, as defined in the Equality Act 2010.

This is because it provides more affordable homes of a higher quality that are safer, more accessible and more fuel efficient and sustainable and therefore have the potential to help reduce fuel poverty and improve the quality of life for people of all ages and backgrounds.

The new homes will be an opportunity to ‘design out crime’, therefore improving community safety in Hayes.

They will also be an opportunity to build new homes to modern accessibility standards such that those with disabilities will be able to benefit from more appropriate and adaptable homes in terms of level access, wheelchair accessibility etc.

New safer play areas will benefit young people.

Finally, this redevelopment also allows the council to build larger homes that will positively impact large families with children, who are currently overcrowded.

A.2) Who are the service users or staff affected by what you are assessing? What is their equality profile?

The residents being affected are those who live on the Hayes Town Centre and Avondale Drive Estates in the Townfield Ward.

Townfield lies in the South East of Hillingdon and is bordered by Charville, Barnhill, Yeading, Botwell and Pinkwell as well as the London Borough of Ealing.

The current population of the borough as a whole and Townfield as a ward by sex and age is: (source: ONS Small Area Population Estimates (SAPE), 2019-based)

		Male		Female				
Borough	306,870	50.3%		49.7%				
Townfield	16,575	51.2%		48.8%				
Age Groups %	<16	16-24	25-34	35-44	45-54	55-64	65-74	75+
Borough	21.9%	10.9%	15.2%	15.2%	12.8%	10.4%	7.1%	6.4%
Townfield	24.7%	10.3%	15.3%	16.4%	12.7%	10.1%	5.6%	4.9%

Broadly, Townfield has more under 16s than borough total and less 65+ than borough total.

In terms of ethnicity, based on the GLA Ethnic Group Population Projections 2016, the total borough population is 50.6% from BAME backgrounds and 49.4% non-BAME.

At ward level, the most up to date information is from the Census 2011 which

shows that 62.9% of the population are from BAME backgrounds and 37.1% non-BAME.

Looking at the change at borough level, it's most likely that Townfield ward will now be over 70%.

This ward has the highest number of people who live in deprived households in Hillingdon at 22%, compared to the borough average of 14% (source PHE Local Health 2015)

Equality data, where known, for the estates is presented below. It has been gathered as part of a tenancy management survey.

It is important to note that data for ethnicity was withheld or unavailable for 46% of residents and leaseholders.

Private renters are not included in the statistics unless they are on the housing register.

Data is therefore only available for 70% of the properties on the Hayes Town Centre Estate and 81% on the Avondale Drive Estate.

Hayes Town Centre Estate

Of the 260 total homes there are 182 council owned homes with an estimated population of 452 people.

In terms of sex, there are more female tenants than male tenants (57% compared to 43% respectively) which is greater than the ward population of 48.8% female.

In terms of age, there are 102 tenants under 16 (27%) which is slightly above the ward population of 24.7%.

In terms of age, the number of tenants aged 65-74 is 5% and those aged over 75 is estimated to be 5% (10% total). This is in line with the ward profile of 5.6% and 4.9% respectively and slightly lower when compared to the total borough population of over 65's at 13.5%.

The largest ethnic group is Black African at 24% which is significantly higher than the total borough population of 7.3%¹ Black British, African Caribbean and African. Of those identifying as Black African, the majority are Somali.

The second largest ethnic group at 11% is White British which is significantly lower than the total borough population of 60.6%² White.

The third largest is Asian (Other) at 7% which is significantly lower than the total borough population of 25.3%³ Asian or Asian British.

There are 12 households where someone has disclosed that they have a disability.

Avondale Drive Estate

Of the 144 total homes there are 117 council owned homes with an estimated population of 318 people.

In terms of sex, there are more female tenants than male tenants (54% compared to 46% respectively) which is greater than the ward population of 48.8% female.

In terms of age, there are 70 tenants under 16 (22%) which is slightly below the ward population of 24.7%.

In terms of age, the number of tenants aged 65-74 is 9% and those aged over 75 is estimated to be 5% (14% total). This is slightly higher when compared to the total borough population of over 65's at 13.5%.

The largest ethnic group is Black African at 21% which is significantly higher than the total borough population of 7.3%⁴ Black British, African Caribbean and African. Of those identifying as Black African, the majority are Somali.

The second largest ethnic group at 11% is White (Other) which is significantly lower than the total borough population of 60.6%⁵ White.

The third largest is White British at 7% which is significantly lower than the total borough population of 60.6%⁶ White.

There are 15 households where someone has disclosed that they have a disability.

1,2,3,4,5,6 Ethnicity of all usual residents Census 2011

A.3) Who are the stakeholders in this assessment and what is their interest in it?

Stakeholders	Interest
Residents of Hayes Town Centre and Avondale Drive Estates	That the regeneration proposals bring forward more high quality homes of all tenures that are safer, more accessible and more fuel efficient and sustainable. That the regeneration proposals improve the quality of life for residents. That the needs of residents are taken into account during the re-housing process and disruption is kept to a minimum.

<p>Director of Infrastructure, Building Services and Transport</p>	<p>That the regeneration proposals bring forward more high quality homes of all tenures that are safer, more accessible and more fuel efficient and sustainable.</p> <p>That the regeneration proposals improve the quality of life for residents.</p> <p>That the needs of residents are taken into account during the re-housing process and disruption is kept to a minimum.</p> <p>That by providing additional and affordable homes, this will help to reduce waiting times on the housing register and alleviate pressure.</p>
<p>Director of Planning, Environment, Education and Community Services</p>	<p>That the regeneration proposals bring forward more high quality homes of all tenures that are safer, more accessible and more fuel efficient and sustainable.</p> <p>That the regeneration proposals improve the quality of life for residents.</p> <p>That the needs of residents are taken into account during the re-housing process and disruption is kept to a minimum.</p> <p>That by providing additional and affordable homes, this will help to reduce waiting times on the housing register and alleviate pressure.</p>
<p>Chief Executive</p>	<p>That the regeneration proposals bring forward more high quality homes of all tenures that are safer, more accessible and more fuel efficient and sustainable.</p> <p>That the regeneration proposals improve the quality of life for residents.</p> <p>That the needs of residents are taken into account during the re-housing process and disruption is kept to a minimum.</p>

	That by providing additional and affordable homes, this will help to reduce waiting times on the housing register and alleviate pressure.
Leader of the Council and Council Cabinet	<p>That the regeneration proposals bring forward more high quality homes of all tenures that are safer, more accessible and more fuel efficient and sustainable.</p> <p>That the regeneration proposals improve the quality of life for residents.</p> <p>That the needs of residents are taken into account during the re-housing process and disruption is kept to a minimum.</p> <p>That by providing additional and affordable homes, this will help to reduce waiting times on the housing register and alleviate pressure.</p>

A.4) Which protected characteristics or community issues are relevant to the assessment?

Age	✓	Sex	✓
Disability	✓	Sexual Orientation	
Gender reassignment			
Marriage or civil partnership		Carers	
Pregnancy or maternity		Community Cohesion	✓
Race/Ethnicity	✓	Community Safety	✓
Religion or belief		Human Rights	

STEP B) Consideration of information; data, research, consultation, engagement

B.1) Consideration of information and data - what have you got and what is it telling you?

It is important to note that data for ethnicity was withheld or unavailable for 46% of residents and leaseholders.

Private renters are not included in the statistics unless they are on the housing register.

Data is therefore only available for 70% of the properties in Hayes Town Centre and 81% of Avondale Drive.

There is a higher number of women and Black African people living on the estates when compared to the total borough population.

Consultation

B.2) Did you carry out any consultation or engagement as part of this assessment?

Please tick NO YES

The proposal to go ahead with redevelopment has been the subject of extensive consultation with residents since August 2020 and has culminated in a GLA compliant resident ballot.

Pre-Ballot engagement

In drawing up the design and rehousing proposals the council has undertaken a significant amount of consultation with residents. The council commissioned specialist external consultants, Icen Projects, to deliver the consultation plan and has been careful to consider potential barriers to engagement for the protected groups.

In November 2020 all residents received an invitation to join a resident steering group. This had a regular attendance of around 20 residents representing all of the tenures and a wide variety in terms of gender, ethnicity and age.

One of the first tasks of the resident steering group was to interview and commission an Independent Tenant and Leaseholder Advisor (ITLA). The companies chosen are also tasked with identifying those on the estate with language or other barriers to engagement and can provide translation/interpreter services when required.

Due to Covid restrictions meetings had to take place virtually and strenuous efforts were made to ensure that those unfamiliar with the technology were able to participate. However, the fact that attendance was high compared to other estate regeneration projects led the team to believe that this mode of communication in fact suited some groups better than traditional meetings.

A WhatsApp broadcast group was also established to keep residents updated with events and information.

Due to the fact that physical drop in events could not take place, the council complemented the virtual meetings with paper packs covering design and newsletters that were distributed to all residents, followed by tenure specific 'Guides' to explain how rehousing would work.

All paper communication extended an offer to help with further explanation and translation if necessary and a freephone number.

Conscious that some residents in the protected groups, such as older residents, much prefer face to face engagement the council resumed one-to-one appointments on site in gazebos as soon as restrictions allowed.

Events have been timed so that parents with young children can attend before school pick up or in the evening and on Saturdays.

Several languages are spoken on the estates, but the majority of households contain at least one family member who speaks very good English and there have been limited occasions where interpreters have been required.

However, in the light of the fact that such high percentages of Hayes Town Centre and Avondale Estate residents are Somali speakers the council has made sure that there is a member of staff that is a Somali speaker at all drop in events who can explain the offer and this has proved very popular with residents.

The Landlord Offer and ballot arrangements

There are 236 residents that are eligible to vote at Hayes Town Centre and 139 at Avondale Drive. There is no discretion for the council in terms of eligibility as it is obliged to follow the GLA rules for resident ballots.

If you are 16 or over, you can vote if you are:

- A council secure tenant or a housing association assured tenant, inc introductory and fixed term, named on the tenancy agreement
- A resident leaseholder who has been living in the property as your principal residence for a year
- A resident on the estate who has been on the housing register for a year or more

The council has been guided in the arrangements for the ballot by its “Independent Body” Civica, commissioned to carry out the ballot completely independently of the council in accordance with GLA requirements. They sent out letters to all residents in advance to check that they have the correct details etc before ballot papers were sent out on 28th April 2021.

Residents were sent unique voting codes and could vote using a prepaid envelope, on-line or over the phone. Assistance was available to anyone who is finding the process hard to understand.

Residents had three weeks in which to cast their vote from the day the ballot paper is issued which is a GLA requirement.

The Landlord Offer was delivered to all eligible households two weeks before the ballot opened. It was produced in an eye-catching way to convey the main features of the new development and attempts to balance providing the detail that some residents want with the communication of the key facts for those who prefer the information summarised – for instance in the form of the ‘commitments’ page at the front of the document that contains the key facts.

It was produced in 12 pt font to make it easy to read and although it has not been provided fully in translation this can be provided on request. In acknowledgement of the large group of Somali speakers on the estate a letter containing the key information was sent out in Somali to all council tenants, where the council had a record of their first language. The council has also put posters up on the estates in Somali emphasising the key commitments so that there is no misunderstanding and the offer to provide translation services has been repeated on regular newsletters.

Finally, staff continue to be available for one-to-one conversations on the phone or on site, with interpreters available.

B.3) Provide any other information to consider as part of the assessment

Often the process of regeneration is a catalyst for action in the community that builds on existing strengths and encourages inclusion, community cohesion and fosters good relations between those with protected characteristics and those without.

It also allows existing residents to benefit from additional social value aspects such as training and employment opportunities.

The Council is also aware that as the redevelopment proceeds it may have some short-term adverse impacts on certain groups for instance older or more vulnerable groups. The disruption of moving home can cause anxiety for vulnerable groups, particularly if they have lived in their home for many years.

To mitigate this, in addition to providing financial compensation and arranging removals the council will provide an additional comprehensive package of support to assist vulnerable tenants such as packing and unpacking services, help with moving utilities and physical adaptations to the new homes where needed.

The Council will also try to arrange moves with neighbours where they provide informal support where requested. The aim is to make moving as stress free as possible.

Impact of Rehousing proposals

- The Landlord Offer allows for tenants to access housing that fits their housing needs – in particular this will benefit families with young children and those whose current homes are unsuitable due to health/mobility issues.
- Council tenants have the right to return (or remain) to the new estate – this aids community cohesion.
- The phased scheme means that most residents will only have to move once, minimising disruption – this is particularly important for vulnerable and older residents
- To minimise the worry around moving there will be a dedicated decant officer and a comprehensive package of support with the arrangements for moving and all the costs are covered - there is extra help for older and vulnerable residents such as a packing service to mitigate any adverse impacts to these groups.
- The council will take into consideration requests to move with neighbours where there is a support network – this is particularly important for older residents and will aid community cohesion.
- If a resident has to move temporarily while a new home is built for them the council will find accommodation as close as possible to their current address and will take into consideration need for proximity to schools, GPs etc – this will mitigate any adverse impact in terms of community cohesion.
- If tenants are currently under-occupying, they can retain one extra bedroom- this will aid those that might need a carer to stay over.
- If residents don't want to stay on the estate they can move to other social housing in the borough, including specific over 60s flats and bungalows if they are eligible – this benefits older residents who will be helped with this move if it is their preference.

- Leaseholders will have options such as the shared equity product that will allow them to remain on the estate – this will mitigate any adverse impact in terms of community cohesion.
- There are opportunities for eligible residents currently in TA or private rented to move into one of the new council homes – this will aid community cohesion and allow families to access suitably sized accommodation.

C) Assessment

C.1) Describe any **NEGATIVE** impacts (actual or potential):

The impact of the disruption of rehousing may have a short term disproportionately negative impact on older people, vulnerable people or those with a disability.

Procedures will be put in place to mitigate against any negative impact including a dedicated decant officer, a comprehensive package of support for moving arrangements including all the costs being covered, and a packing service.

C.2) Describe any **POSITIVE** impacts

There are many positive impacts of the proposed redevelopment which would benefit people with protected characteristics. These are outlined below.

- The new design allows for step free access to all areas – this will be particularly beneficial for those with mobility issues and parents with young children.
- The new homes will incorporate occupational therapist recommended adaptations and 10 of all homes are being designed to wheelchair accessible standards – this will be particularly beneficial to those with mobility issues, their carers and some older residents.
- The new estate will include a mixture of flat types, some with open plan kitchen dining living rooms and some with separate kitchens to cater for different preferences.
- There will be a greater range of homes available, from one bed to four bed homes – this will benefit families with children and those in extended family groups. This is particularly true at Avondale Estate where currently all homes are two bed flats.
- There will be discrete residential blocks around resident only courtyard communal gardens and fewer homes per communal entrance – this will aid community cohesion and safety.
- The existing community room at Hayes Town Centre will be provided in a new facility with frontage to a new public square – aiding community cohesion.

- The new homes will be designed with more front doors onto the street and greater natural surveillance – increasing community safety.
- There will be new safer play areas – benefitting younger residents.

D) Conclusions

The council believes that the redevelopment will provide positive opportunities for existing residents and the wider community, including those with protected characteristics.

This is because it provides more affordable homes of a higher quality that are safer, more fuel efficient and accessible, therefore improving the quality of life for people of all ages and backgrounds.

The council has taken into account the views of residents in drawing up its final rehousing proposals and these are reflected in a specific Local Lettings Policy. In particular it has made provision for eligible residents in private rented and TA to stay on the estate in order to further community cohesion.

The council is aware that if the redevelopment proceeds it may have some short-term adverse impacts on certain groups, for instance older or more vulnerable residents. The disruption of moving can cause anxiety for residents and the council will have procedures in place to mitigate this as part of its rehousing proposals.

Signed and dated: *Perry Scott* *18 May 2021*

Name and position: Perry Scott, Corporate Director of Infrastructure, Transport & Building Services