
Planning Statement

Avondale Drive Estate Regeneration

Hybrid Planning Application



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Executive Summary

LBH wants to ensure that Avondale 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 Avondale Drive Estate residents, to deliver high quality homes across a mix of unit types and within a newly revitalised neighbourhood.

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

- I. Delivery of more homes, of which 52.5% (based on floorspace) will be affordable;
- II. Replacement of all existing affordable homes in the form of Social Rent Tenure units, allowing all current residents to return to the estate;
- 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, as well as improved access routes and gateways;
- V. Provision of affordable renewable energy sources and highly efficient homes;
- VI. 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;
- VII. Net increase in play space across the entirety of the Site, both in quality and quantum terms;
- VIII. Comprehensive landscape and tree planting strategy that will result in biodiversity and ecological net gain on the Site;
- IX. Substantial public realm improvements and enhanced connections to the wider street network with a new north – south link through the development, providing pedestrian access onto Hitherbroom Park;
- X. 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 current and emerging planning policy.

In summary, the Illustrative Masterplan proposed will ensure the creation of an indicative 240 homes, comprising a replacement of the 144 homes currently on the Site alongside an uplift of 96 homes. These will be delivered as a mix of sizes, of which more than 52.5% (based on floorspace) will be affordable, within three distinct development zones, shown indicatively to comprise 8 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, Block A is proposed in detail and will comprise 30 residential units as part of the Detailed First Phase.



As set out in this Planning Statement, it is concluded that the proposal 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 Avondale Drive 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 Avondale Drive Estate, Hayes, London, UB3 3DN ("the Site"). The Site falls within the administrative area of London Borough of Hillingdon and therefore the LBH Local Planning Authority ("LBH LPA") will determine the planning application. At **Appendix 1** is attached a Site Location Plan to show the full extent of the red line boundary in relation to this application.
- 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 planning application to address the full range of planning considerations. A full list of the submitted documents and drawings is 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:
- 1.4. *"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; new pedestrian and vehicular accesses; 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 Block A comprising 30 residential units (Class C3); new pedestrian access; associated amenity space and landscaping; cycle parking, refuse storage, and other associated infrastructure."

Structure of Hybrid Planning Application and Supporting Documents

- 1.5. This Application is being submitted as a hybrid proposal which seeks planning permission for the development of 240 units overall. It comprises elements in detail (the 'Detailed First Phase') and in outline (the 'Outline Area'). The detailed element comprises 30 residential units which will come forward across a single block (Block A) in addition to a new pedestrian access; associated amenity space and landscaping; cycle parking; refuse storage, and associated infrastructure (to include temporary highways works). The outline component (appearance, landscaping, layout and scale and access reserved) relates to the development of 210 units including car and cycle parking and open space. These elements are defined on Parameter Plan 1 - Development Zones Parameter Plan (reference: AVD- PTE- VD-XX-DR-A-10005), 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 which also comprises the Outline Area.

- 1.6. 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 estate in line with LBH's vision. The Detailed First Phase of the Hybrid Planning Application seeks planning permission for 2,226 square metres GIA within Block A at the western end of the Site. 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.
- 1.7. 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 future 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 two remaining Development Zones. Based on the Illustrative Masterplan this has the potential to comprise seven blocks (B – H), with a combined maximum GIA of 14,456 square metres.
- 1.8. Both the Outline Area and the Detailed First Phase combined form "The Avondale Drive Estate Illustrative Masterplan". This has been submitted as part of the application for indicative purposes only and is based upon the proposed parameters. It therefore sits within the envelope of development assessed as part of the application.
- 1.9. As noted above, the Development Specification Statement submitted alongside this Planning Statement for 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 a comprehensive list of the Supporting Documents and Drawings (respectively) submitted as part of this Hybrid Planning Application with the latter setting out those plans for approval, planning information and for illustrative purposes. In summary, these can be grouped and summarised as follows:

Documents for Approval

- I. Parameter Plans, to include:
 - 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
 - Landscape Plans

Supporting Information

- I. Planning Documents, to include this Planning Statement and the Development Specification Statement
- II. Design Documents, to include the Design and Access Statement
- III. Existing Site Plan and Drawings
- IV. Illustrative Masterplan
- V. Contextual and Illustrative Drawings
- VI. Illustrative Landscape Strategy
- VII. Technical Impact Assessments
- VIII. Indicative Demolition Plan
- IX. Indicative Phasing Plan
- X. Indicative Tenure Distribution Plan

Structure of this Statement

- 1.10. 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 Avondale Drive Estate in order to provide existing residents and future generations with high quality homes and affordable homes as well as providing a good place to live through new and improved public realm, external amenity and green infrastructure. The Site forms part of the Hayes Housing Zone designation in the Local Plan Part 2 (2020) which has been designed to act as a catalyst to support 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 Avondale Drive Estate's regeneration.

The Site

- 2.3. The site comprise 1.07 hectares and is occupied by the existing Avondale Drive Estate ("the Estate"). The estate consists of three 13-storey blocks of flats, each containing 48 flats (total 144 homes). Between each tower are large covered car parking areas. To the west of the blocks is an area of garages and additional car parking. All existing dwellings are two-bedroom flats. The blocks were constructed in the late 1960s using a large panel system.

Table 1: Existing Housing Mix by Tenure

Existing Housing Tenure Mix	Number
Affordable / Social Rented	116
Housing Association Rented	5
Resident Home Owners (leaseholders)	8
Non-resident Home Owners (Absentee Landlords)	15
AFFORDABLE TOTAL	121
OVERALL TOTAL	144

Table 2: Existing Unit, Habitable Room and Floorspace Split

	1 Bed	2 Bed	3 Bed	4 Bed	Total	Total GIA
<i>Affordable (incl. Social Rented & HA Rented Properties)</i>						
Units	0	121	0	0	121	7,755
Hab Rooms	0	484	0	0	484	

Floorspace (sq.m) GIA	0	7,755	0	0	7,755	
<i>Private Leasehold</i>						
Units	0	23	0	0	23	1,723
Hab Rooms	0	92	0	0	92	
Floorspace (sq.m) GIA	0	1,723	0	0	1,723	

- 2.4. The Estate is bound by Avondale Drive to the south and Abbotsway Way to the east. Pedestrian access is provided onto Abbotsway Way from the Estate. Both pedestrian and vehicular access is provided onto Avondale Drive to the south. Minet Junior School is located directly to the west, directly to the north of the Estate is Hitherbroom Park, which forms part of a Site of Nature Conservation Importance (Borough Grade 1). To the south of the Estate is low rise housing.
- 2.5. Beyond Abbotsway Way to the east is the A312, the River Crane and then Minet Country Park. The A312 connects to the A40 and the M4, both of which provide access to the M25. Pedestrian and cycle access is provided to Minet Country Park (0.1 miles from the site) via an underpass which passes under the A312. The estate is approximately 0.4 miles due north-east of Hayes Town Centre.
- 2.6. There is an existing estimated total car parking provision of 88 spaces on-site (equating to 0.61 spaces per unit). Existing spaces are provided predominately in two covered car parking areas in the centre of the estate, accessed via Avondale Drive.
- 2.7. In terms of environmental designations, the site is located within Flood Zone 1 and therefore has a low probability of flooding. There are sporadic trees around the boundary of the estate. Some of these provide significant amenity value. None of the trees on the Estate or in the surrounding are subject to Tree Preservation Orders.
- 2.8. There are no local or statutorily Listed Buildings within the Site's red line boundary or within the surrounding area.

Surrounding Area

- 2.9. The surrounding area is predominantly residential with a variety of housing types. The nearest residential properties including those on Avondale Drive to the south date from the 1980's and comprise two storey terraced and semi-detached housing. Further along Avondale Drive to the west of the Estate lies Triscott House which is a 3-storey building providing Extra Care Housing.
- 2.10. The northern boundary is shared with the Minet Infant School's playing fields as well as Hitherbroom Park. Beyond this are the rear gardens of residential properties fronting Hughes Road and Abbey Close.

- 2.11. Hayes & Harlington station is approximately 1 mile to the south-west of the estate, with 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.
- 2.12. The site has a PTAL score 1B (with a small part identified within PTAL 2), indicating low public transport connectivity, although the site benefits from being located close to a number of established bus routes available within 5 minutes' walk from the site that provide access to a range of destinations across London. The nearest paired bus stops to the site are located on Coldharbour Lane, known as 'Avondale Drive' and additional bus stops are also present further north next to the Lombardy Retail Park. Table 3 sets out the routes, service frequencies and stops available within walking distance of the site.

Table 3: Local Bus Services

Service Number	Nearest Stop	Route	Frequency		
			Weekday Peak Hour	Saturday	Sunday
90	Coldharbour Lane (Avondale Drive)	Feltham, Leisure West – Northolt	6	6	4
140	Coldharbour Lane (Avondale Drive)	Harrow Weald, Bus Garage – Hayes & Harlington Station	8	8	5
696	Coldharbour Lane (Avondale Drive)	Bishop Ramsey School – Hayes, Bourne Avenue	2 AM Services & 2 PM Services (School Service)	No Service	No Service
E6	Coldharbour Lane (Avondale Drive)	Bulls Bridge – Greenford Station	5	5	4
N140	Coldharbour Lane (Avondale Drive)	Harrow Weald, Bus Garage – Heathrow Central	Weeknight 00:15-06:15: 2	Saturday Night 00:15-06:15: 2	Sunday Night 00:15-06:15: 2
U7	Lombardy Retail Park	Uxbridge Station – Lombardy Retail Park	2	2	2
427	Uxbridge Road (The Grapes)	Acton, High Street – Uxbridge	8	8	6
607	Uxbridge Road (The Grapes)	White City – Uxbridge	7	6	5

N207	Uxbridge Road (The Grapes)	Holborn – Uxbridge	Weeknight 00:15- 06:15: 2	Saturday Night 00:15- 06:15: 2	Sunday Night 00:15- 06:15: 2
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2.13. Table 3 therefore confirms that existing bus provision provides access to much of northwest London.

Planning History

2.14. 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.

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 application. 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 also 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 Planning, Design and Technical Officers; the Greater London Authority (GLA); and, other key statutory and local stakeholders to include LBH Councillors, Transport for London (TfL) and Heathrow Aviation Authority.
- 3.5. Following the national lockdown enforced by 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, 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 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 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 144 households and a key priority for the applicant 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 (October 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 this 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, and following design development work on the full redevelopment option of the existing Estate, to include informal and formal pre-application advice from LBH 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. 94% of residents voted YES for full redevelopment of the existing estate from a high turnout rate of 85%.
- 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 Statement of Community Involvement.
- I. **Resident Design Consultation Event 1:** On the 16th February 2021, a drop-in consultation event was 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 at the Avondale Drive Estate on the 22nd July 2021 in the disused outdoor car park (located next to the playground). The first resident design workshop in July 2021 ran concurrently with the first public consultation (see next section) and provided residents with an opportunity to discuss the design proposals in detail with the architects. This event was hosted by Icení and a total of 47 people attended. The event comprised of physical exhibitions and models of the different types of new homes were on display 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 22nd July 2021 in which a total of 47 people attended from the wider local community. The event was hosted in council branded gazebos erected on Site in the car park next to the playground close to Wellings House to ensure COVID-safety. The event comprised of physical exhibitions and provided an opportunity to meet the project team and understand the emerging designs with an Illustrative Masterplan and key sketch views 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 increased greening of the Estate to include the residential gardens.
- V. **Resident Design Workshop Event 2:** An in-person drop-in consultation event was held on 7th October 2021 which focused on the architectural appearance and feel of the emerging proposals. It provided information on materials; brick colours and detailing; balcony types; front gardens; and, windows. More detailed discussions on play facilities and the layouts of the 4-bed duplexes also took place given residents' preferences for a separate kitchen area in the large family homes
- VI. **Public Exhibition Event 2:** An in-person drop-in consultation event was held on 17th November 2021 within the Minet Infant Primary school hall. A total of 32 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 connections to Hitherbroom Park, The use of brick as the predominant external material, the availability of private outdoor space for residents and public realm landscaping proposals.

3.14. The full details of the resident and public consultation and engagement process is set out in the submitted Statement of Community Involvement. 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 where they have informed the Proposed Development and 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.

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 then 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 September 2021, with technical discussions continuing up until submission of the application.
- 3.16. The project team engaged directly with Officers at LBH LPA in relation to the emerging proposals, with discussions 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:
- I. Pre Application Inception Meeting – Monday 15th March 2021
 - II. Technical Transport Meeting – Wednesday 2nd June 2021
 - III. Pre Application Meeting 1 - Wednesday 16th June 2021
 - IV. Design Review Workshop – Monday 5th July 2021
 - V. Pre Application Meeting 2 - Friday 27th August 2021
 - VI. Arboricultural Site Visit – Thursday 16th September 2021
 - VII. Pre Application Meeting 3 - Monday 27th September 2021
 - VIII. Technical Energy Meeting – Tuesday 5th October 2021
 - IX. Technical Transport Meeting – Friday 15th October 2021
 - X. 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 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 boundary treatment with the adjacent Hitherbroom Park with illustrative materials provided as part of the HPA (within the Outline Area).
- VI. The proposed approach to the Townscape and Visual Impact Assessment (TVIA), to include agreement of viewpoints.
- VII. Provision of communal and private amenity space, in the form of private gardens, balconies, terraces and courtyards as well as communal podium gardens.
- VIII. 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 4th July 2021. This meeting was to primarily discuss the principles of the scheme relating to 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 neighbouring Hitherbroom Park to the north. The respective formal written pre-application report received on 1st September 2021 was supportive in terms of the design approach (in terms of maximum 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 met therefore London Plan policy H8 subject to the GLA viability officer’s review of the submitted FVA.
- 3.20. Subsequent to this 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 with further focus on Design Illustration to discuss treatment of certain blocks. Detailed First Phase (Block A), daylight and sunlight and overshadowing matters, arboriculture and townscape considerations. 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 the 18th November 2021. This confirmed continued support for the proposed regeneration of the estate, noting the uplift in replacement social rented 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 are set out in detail within the submitted Energy and Sustainability Assessments which support the HPA.
- 3.22. The development proposals have evolved since conception following on from feedback and review by 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 residential redevelopment of the estate and the proposed density are acceptable in principle 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 this 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). Officers stressed the importance of LP Policy H8 and the need for early engagement on the FVA.
 - III. The proposed (maximum) heights and massing as well as indicative 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 alongside landscaping and public realm. The principle of the play strategy was accepted in achieving London Plan standards for doorstep play and older children play to be provided on southern parts of the estate and potentially off-site at the adjoining Park.
- 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 4th August and the 1st September. TFL officers provided feedback on the proposed transport and car parking strategy.

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 the 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)
- Secured by Design
- Minet Nursery and Infant School

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 proposal 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; new pedestrian and vehicular accesses; 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 Block A comprising 30 residential units (Class C3); new pedestrian access; associated amenity space and landscaping; cycle parking, refuse storage, and other associated infrastructure.”

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 144 existing homes, ancillary plant rooms and garages blocks across the estate are required to be demolished.
- 4.5. The principle of demolition to enable the full redevelopment of the Site has been agreed with LBH 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 garages in the western portion of the Site, known as Phase 1a and proposed to provide 30 new homes. A sequenced approach is then to be taken across the remaining two phases, which will see subsequent demolition of the remaining existing buildings to facilitate the delivery of development within Development Zones 2 and 3, as set out on Parameter Plan 1. 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. An Indicative Tenure Distribution Plan and Indicative Phasing Plan have been prepared and submitted as part of this HPA along with an Indicative Demolition Plan. 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 commencement of demolition works is expected to take place in Summer 2022, with initial construction works of the Detailed First Phase taking place from September 2022, with completion of the regeneration of the whole estate by 2027 (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 4 below therefore sets out the indicative construction and delivery programme across the three 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 4: Indicative Construction and Delivery Programme

Proposed Development Phase		Start date	Finish date
Construction of Phase 1a (Block A)		Autumn 2022	Summer 2024
Outline Area	Phase 1b (Blocks E - H)	Spring 2023	Spring 2025
	Phase 2 (Blocks B, C and D)	Spring 2025	Summer 2027

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 within which the detailed design of the Outline Area must come forward, these are as follows:
- **Scale and Massing:** The massing will be as such to accommodate an appropriate increase in new homes and non-residential floorspace across the Site. Alongside this, the buildings themselves by virtue of their articulation and scale will demonstrate a coherent relationship with the surrounding buildings, sky line and urban grain. In this respect, impacts on surrounding uses and views was a key consideration informing the design' evolution.
 - **Connectivity:** The proposals introduce new pedestrian north-south access between the Avondale Drive, the Estate and Hitherbroom Park, as well as east-west pedestrian access across the proposed Estate along the northern and southern boundaries of the site.
 - **Green Infrastructure, Public Realm and Open Space:** The proposed scheme includes open space and public realm in the form of new green living streets, children's play areas and communal podium gardens which are located within urban blocks to provide usable shared outdoor amenity space.
 - **A New Homes and Revitalised Community:** The provision of homes which are of the highest quality of design has been fundamental to the evolution of the Masterplan. The homes are 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 2-3 (inclusive). Based on the Illustrative Masterplan this has the potential to comprise seven blocks (B – H), with a combined maximum GIA of 14,456 square metres. Table 5 below indicates how this maximum GIA is distributed by zone and block.

Table 5: Outline Area - Maximum Floor Area by Development Zone and Block (Indicative)

Development Zones	(Indicative) Block	Residential Units and Floorspace (GIA)*
2	Block E	37 units 2,408 sqm
	Block F	22 units 1,606 sqm
	Block G	36 units 2,288 sqm
	Block H	25 units 1,798 sqm
3	Block B	29 units 2,032 sqm
	Block C	30 units 2,190 sqm
	Block D	31 units 2,134 sqm
Overall Total		210 units 14,456 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 5, the residential GIA floorspace of the outline component of the application is based on the Illustrative Masterplan. 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 1.

Residential Floorspace

- 4.13. As illustrated on the Parameter Plan 1, the residential provision proposed across the Outline Area will be contained within Development Zones 2 and 3. The total outline residential quantum would comprise a maximum of 14,456 square metres gross internal area ("GIA") of residential unit floorspace which, with the current illustrative unit and tenure mix set out in Table 6 (both in unit numbers [u] and in habitable rooms [hr]) equates to 210 homes. When read alongside the Detailed Area (which comprises 2,226 square metres GIA of residential unit floorspace) the total maximum residential unit provision across the Masterplan will be 16,682 square metres. This compares to the 9,478 square metres of residential floorspace across the estate, as existing.

- 4.14. As above, whilst the intention with this application is to fix the 14,456 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 RMA's. 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 210 units that could be delivered through the regeneration existing estate. This has informed the Indicative Unit Range Mix (%) 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 term of both size and tenure) will come forward across the Outline Area. As set out at Table 6 below, this includes Social Rent Replacement homes forming the affordable tenure mix 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 6: Illustrative housing size and tenure mix across Outline Area (Indicative)

	1 Bed	2 Bed	3 Bed	4 Bed	Total
Social Rent Replacement Homes	22 units 44 hr 1,120 sqm	39 units 117 hr 2,948 sqm	23 units 115 hr 2,106 sqm	3 units 18 hr 360sqm	87 units 294 hr 6,534 sqm
Private	56 unit no. 112 hr 2,840 sqm	60 unit no. 180 hr 4,410 sqm	7 unit no. 35 hr 672 sqm	N/A	123 units 327 hr 7,922 sqm
TOTAL	78 units 156 hr 3,960 sqm	99 units 297 hr 7,358 sqm	30 units 150 hr 2,778 sqm	3 units 18 hr 360 sqm	210 units 621 hr 14,456 sqm
TOTAL (%) (based on unit no)	37%	47%	14%	2%	100%

Table 7 Indicative Unit Range Mix (%) across the Illustrative Masterplan

	1 Bed	2 Bed	3 Bed	4 Bed
Indicative Unit Range (%)	15 - 35%	28 - 48%	13 - 15%	0 – 2 %

Height and Massing

- 4.16. Parameter Plan 2 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 the 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.
- 4.17. The illustrative proposals for the Outline Area comprise seven consolidated blocks (B – H) across the site which vary in height between 5 – 10 storeys. The tallest 10 storey element is positioned in the north eastern corner of the site, where massing would be at the furthest point away from the existing residential properties along Avondale Drive to the South and the Minet Infant School to the north west.
- 4.18. Parameter Plan 2 defines the maximum buildings 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 and informed by the existing site levels. This is also within the backdrop of existing 13 storeys overall where the proposals result in an overall reduction in height to a maximum height of 10 storeys.
- 4.19. Table 8 below sets out the Maximum Proposed Heights per Development Zone and, in applying this to the Illustrative Masterplan, has established Indicative Proposed Height on a block by block basis.
- 4.20. The maximum height parameters include an upper tolerance of + 1m to allow for roof plant for example which may 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 Proposed Heights for the Outline Area

Development Zone	Block	Communal Podium Garden (indicative)	Maximum Height in AOD
2	Block E	35.2m	63m (up to 10 storeys)
	Block F	35.2m	47.8m (up to 5 storeys)
	Block G	35.2m	63m (up to 10 storeys)
	Block H	35.2m	57m (up to 8 storeys)
3	Block B	N/A	53.8m (up to 7 storeys)
	Block C	35.2m	47.8m (up to 5 storeys)
	Block D	35.2m	53.8m (up to 7 storeys)

Open Space and Landscaping

4.21. The HPA includes open space and public realm in the form of new green living streets, strategic landscaping and public realm, children's play areas and communal podium gardens. 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 1,306 square metres of public open space, public realm and landscaping is proposed estate-wide, as shown on the Illustrative Masterplan. This equates to 13% of the Site and comprises the Avondale Drive Strategic Public Open Space Area and greening within the streetscene, to include to the perimeter of the blocks as well as new landscaped areas.

- *Communal*

At total of 1,464 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 of 2,623 square metres of private external amenity space is proposed, as shown on the Illustrative Masterplan. This will take the form of gardens, courtyards and terraces for ground floor and podium level units. Private balconies will be provided for units on upper floors of the residential blocks.

- 4.22. Parameter Plan 4 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.
- 4.23. The delivery of Open Space, Public Realm and Amenity Space within the Outline Area will be guided by the parameters established through Parameter Plan 4 as well as the Illustrative Landscape Strategy and the design principles set out in the submitted Design and Access Statement. Table 9 below sets out the maximum quantum's 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	2,623 sqm
Communal (private) Amenity Space	1,464 sqm
Public Open Space	778 sqm
Public Realm and Landscaping	528 sqm
Total	5,393 sqm

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

Amenity Type	Quantum (sqm)	Form
Public Open Space	737 sqm	Avondale Drive Strategic Public Open Space Area
Public Realm and Landscaping	512 sqm	Greening within the street scene to include to the perimeter of the blocks and new landscaped areas.
Communal (Private) Amenity Space	1,154 sqm	Podium and courtyard gardens
Private Amenity Space	1736 sqm	Ground floor front gardens, ground floor rear gardens / terraces, first floor rear terraces and first floor and above balconies.

- 4.24. In terms of children's play space, as set out in the supporting Design and Access Statement and detailed as part of the Illustrative Landscape Strategy, a total of 994 square metres of children's play space is proposed estate-wide. This comprises 814 square metres of play for children aged 0-4 years and 180 square metres for children aged 5-11 years, as summarised in Table 11 below.
- 4.25. 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 also). Local playable space for use by older children will also be located across the estate and with potential locations within the neighbouring Hitherbroom Park which is adjacent to the estate. This is in addition to provision within the private residential amenity space in the form of balconies, terraces and courtyards.
- 4.26. 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 (sqm)
0-4 years	785 sqm	814 sqm
5-11 years	570 sqm	180 sqm (and off site play facilities potentially located at Hitherbroom Park adjoining the estate).
12+ years	330 sqm	No on-site provision given adequate off site facilities within 400m and 800m walkable distance.
Total playable area	1,685 sqm	994 sqm (with off-site facilities provided and available for older children's play).

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

Play Space Type	London Plan (and LBH Policy DMHB 19) Policy Requirement	On-site Proposed Provision (sqm)
0-4 years	643 sqm	661 sqm
5-11 years	463 sqm	180 sqm (and off site play facilities potentially located at Hitherbroom Park adjoining the estate)
12+ years	258 sqm	No on-site provision given adequate off site facilities within 400m and 800m walkable distance.
Total playable area	1364 sqm	841 sqm with off-site facilities provided and available for older children's play.

Transport and Access

- 4.27. Parameter Plan 3 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.

Car Parking

- 4.28. A total of 82 car parking spaces are proposed as part of the regeneration of the estate, including 8 disabled bays for “Blue Badge” holders.
- 4.29. On the basis of the Illustrative Masterplan and Maximum Unit Parameter (as set out at Table 13), 68 spaces are proposed on-site located at ground level beneath podium areas serving the residential blocks. Active electric vehicle charging infrastructure will be provided for 20% parking spaces and passive provision will be provided for all the remaining spaces. An additional 14 spaces are to be provided on-street along the site perimeter, as defined through Parameter Plan 3. Tables 13-15 below set out the maximum and indicative proposed car parking requirement on a block by block basis.

Table 13: 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	30	0	0	0
2	E, F, G, H	120	40	0.33	4
3	B, C, D	90	28	0.31	4
Cumulative		240	68	0.28	8

Table 14: Maximum and Indicative Proposed On-street Car Parking by Development Zone

Development Zone	Block	Units	On-street Car Club	On-Street Blue Badge	On-Street Unrestricted	On-street total
1	A	30	1	2	0	3
2	E, F, G, H	120	1	0	7	8
3	B, C, D	90	1	0	2	3
Cumulative		240	3	2	9	14

Table 15: Maximum and Indicative Total Car Parking Provision by Development Zone

Development Zone	Block	Units	Grand Total	Parking Ratio	Blue Badge Ratio
1	A	30	3	0.10	2
2	E, F, G, H	120	48	0.40	4
3	B, C, D	90	31	0.34	4
Cumulative		240	82	0.34	0.04

- 4.30. 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 0.28 spaces per residential unit, as an on-site average, plus on-street parking for an estate-wide average of 0.34 spaces per unit. 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.

Cycle Parking

- 4.31. Cycle parking is proposed in accordance with London Plan (March 2021) standards. On the basis of the Illustrative Masterplan and the Maximum Unit Parameter (as set out at Table 6(a)), a total of 440 no. long-stay spaces will be provided for future and returning residents as well as 7 no. short-stay spaces for visitors. Table 16 below sets out the proposed maximum and indicative cycle parking requirement on a block by block basis.

Table 16: Maximum and Indicative Cycle Parking Requirement by Block

Development Zone	Block	Long Stay Spaces (no.)
1	A	57
2	E	66
	F	40
	G	62
	H	47
3	B	54
	C	57
	D	57
Total		440

- 4.32. 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.
- 4.33. For the Detailed First Phase, a total of 57 no. long-stay spaces will be provided for future and returning residents as well as 2 short-stay spaces for visitors. This is based on the fixed Unit Mix for the Detailed First Phase as set out at Table 6(c).
- 4.34. For the Outline Area, the number of cycle parking spaces will 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

Energy and Sustainability

- 4.35. The Proposed Development has been devised with due regard given to local and regional energy and sustainability expectations both during construction and operation are 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.
- 4.36. In this respect, the proposed energy strategy comprises a hybrid solution using a number of Air Source Heat Pumps (ASHP's) 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 and therefore be net zero-carbon entirely through on-site measures.

- 4.37. Further details are set out in Section 6 of this Statement as well as the submitted Energy and Sustainability Statement. The Development Zones of the Outline Area as identified on Parameter Plan 1 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

- 4.38. Within the Detailed First Phase, detailed planning permission is sought for Block A which comprises 30 residential units (Class C3); new pedestrian access; associated amenity space and landscaping; cycle parking; refuse storage and other associated infrastructure to include temporary highways and landscaping works.
- 4.39. The 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.
- 4.40. Block A forms 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.

Layout

- 4.41. Block A is proposed to be located at the existing, under-utilised garages within the far western part of the estate (west of the existing residential towers) and consists of an 'L shaped' building which has been arranged to ensure that there are 21 metre separation distances achieved for all habitable windows. The building encloses a ground-floor level pedestrianised courtyard to the north. On-street car parking is provided in front of the building along one edge of Avondale Drive (with these on-street car parking spaces falling outside the defined Detailed Area).
- 4.42. Block A has been set back from the adjacent school to the west to ensure a 29.9m separation distance with the existing built form at Minet Infant School, as the closest property of relevance to the Detailed First Phase. Furthermore, and in futureproofing the Proposed Development, the outline parameters have been designed to ensure a minimum 21 metre separation distance between the (western) outer building footprint of the Development Zone 2 of the Outline Area and the facing elevation of proposed Block A within the Detailed First Phase.

- 4.43. In terms of orientation, the street side of the building has a south-west aspect. The building layouts are designed to maximise aspect of living spaces over the communal courtyard. In terms of unit distribution, family duplexes are designed at ground and first floor (comprising 3 bed 4 person and 4 bed 7 person units) which benefit from ground floor, private amenity space/ gardens. The upper floor flat apartments comprise 1B2P, 2B3P and 3B4P units each benefiting from private balconies and with all residents benefiting from the communal courtyard space, at ground floor level.

Land Use Quantum

- 4.44. The Detailed First Phase of the HPA seeks permission for 2,226 square metres GIA within Block A at the western 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 17 below.

Table 17: Detailed First Phase - Floor Area by Block

Block	Residential Floorspace (GIA)*
Block A	2,226 sqm
Total	2,226 sqm

- 4.45. **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 Uses

- 4.46. The Detailed First Phase will deliver 30 new homes as the fixed provision to come forward for Block A at 5 storeys. This forms part of the 240 unit total for the scheme and fully complies with the cumulative unit mix set out in Table 23. The dwelling, tenure and habitable rooms of the combined mix across the Detailed First Phase set out in Table 18 below.

Table 18: Housing size and tenure mix across Detailed First Phase

	1 Bed	2 Bed	3 Bed	4 Bed	Total
Social Rent	7 units	16 units	5 units	2 units	30 units
Replacement	14 hr	48 hr	25 hr	12 hr	99 hr
Homes	358 sqm	1,166 sqm	446 sqm	256 sqm	2,226 sqm
Private	N/A	N/A	N/A	N/A	N/A
TOTAL	7 units 14 hr	16 units 48 hr	5 units 25 hr	2 units 12 hr	30 units 99 hr

	358 sqm	1,166 sqm	446 sqm	256 sqm	2,226 sqm
TOTAL (%) (based on unit no)	23%	53%	17%	7%	100%

4.47. In terms of tenure, as illustrated above, Block A will comprise a total of 99 habitable rooms. All 99 habitable rooms will be affordable, which equates to a 100% social rent provision for the Detailed First Phase. As detailed below, this will make up a total of 2,226 square metres of residential floorspace across the detailed Phase 1 proposals.

Table 19: Affordable Provision in Detailed First Phase

Block A	Unit No.	Habitable Rooms	Floorspace (sqm)
Social Rent Replacement	30	99	2,226
Total	30	99	2,226

Height and Massing

4.48. The design of the Phase 1A building is in response to the height and context, which consists predominantly of 3 storey houses with pitched roofs. The building is 5 storeys with a flat roof to minimise the impact of overshadowing the adjacent school.

4.49. The respective height of Block A is set out below in Table 20.

Table 20: Proposed Block Heights in AOD and Storeys for Detailed First Phase

Development Zone	Block	Communal Podium Garden (indicative)	Maximum Height in AOD
1	Block A	N/A	47.8m (5 storeys)

Materiality and Design

4.50. In order to provide visual interest to Block A, brickwork is used as the main facing material throughout, fitting in with the surrounding suburban context. This will create a calm, robust and durable appearance.

4.51. Two multi-stock brick colours are proposed throughout with one light colour mortar. The combination of two bricks will create a tonal difference which is used to define the datum of duplex homes along Avondale Drive.

- 4.52. A contrasting dark claret brick is used to celebrate building entrances and for balcony doors and windows above the datum. An alternating brick detail has been proposed around entrances and openings with a single course of dark claret brick at window heads. The alternating brick detail is designed to give a domestic quality which references the suburban brick detailing of the local context.
- 4.53. Balustrades to balconies will be in a colour which complements the tone of the brick. Bin, bike and plant room doors will be laser cut metal in a colour to match the balconies. Windows will be composite in a warm grey colour to complement the red and dark claret brickwork.
- 4.54. Residential entrances for duplexes are celebrated with a single course alternating pattern of the two bricks. Within the entrance recess is a combination of; glazing, doorsets and framing to match metalwork, and signage for property number.
- 4.55. Communal entrances have a double course alternating pattern of the two bricks and light mortar which extends above the entrance opening and wraps into the communal lobby, improving legibility and emphasising the connection through to the communal courtyard.

Open Space and Landscaping

- 4.56. All residential units within Block A will be provided with private external amenity space in the form of either a terrace or garden for units on the ground or first floor and balconies for those units above. The ground floor terraces and gardens fronting Avondale Drive to the south will be sufficiently set back from the street through landscaping to provide defensible space and sufficient privacy for residents.
- 4.57. The Detailed First Phase will provide 310 sqm of communal amenity space, 41 sqm of new/enhanced open space along Avondale frontage and 17 sqm of soft landscaped areas within the new street scene. A total of 1,255 sqm of external amenity space, public realm and landscaping is proposed and this comprises a range of typologies as set out in Table 21 below at the specified quantum's 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 Phase 1 Illustrative Landscape Plan (ref. AVD-TEP-P1-ZZ-DR-L-90104) with their design rationales and specifications detailed further in the submitted Landscape Strategy.

Table 21: External Open Space, Public Realm and Amenity Space Proposed in the Detailed First Phase

Amenity Type	Quantum (sqm)	Form
Public Open Space	41 sqm	Avondale Drive Strategic Public Open Space Area
Public Realm and	17 sqm	Greening within the streetscene to include to the perimeter of the blocks and new landscaped areas.

Landscaping		
Communal (Private) Amenity Space	310 sqm	Courtyard garden
Private Amenity Space	887 sqm	Ground floor front gardens, ground floor rear gardens and first floor and above balconies.

4.58. Of the total 30 units proposed, all will have access to their own respective provision of private outdoor amenity. In terms of outdoor communal amenity space, each block will have an associated communal (private) courtyard garden which will serve residents only and be landscaped and equipped with playspace for children aged 0-4 years. A total of 153 square metres of accessible doorstep play (to include private gardens) will therefore be delivered to meet the needs of the 0-4 year olds anticipated to be generated as a result of the 30 units to come forward within Block A.

4.59. As set out in more detail in the submitted Design and Access Statement and Landscape Strategy (which includes a 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

4.60. For the Detailed First Phase, all pedestrian access into Block A would be secured from the main courtyard, albeit set back behind landscaping and planters which allude to a more “semi- private” space.

4.61. For the Detailed First Phase, no car parking is proposed on-site and Block A residents will benefit from existing car parking across the estate with a temporary access created from the east.

4.62. For cycle parking, a total of 57 no. long-stay spaces will be provided for future and returning residents as well as 2 short-stay spaces for visitors. This is based on the fixed Unit Mix for the Detailed First Phase as set out at Table 22.

4.63. **Table 22: Proposed On-site Car Parking for the Detailed First Phase**

Development Zone	Block	Units	On-site	On-Site Ratio	On-Site Blue Badge
1	A	30	0	0	0

Energy and Sustainability

4.64. Block A has been designed to incorporate measures 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 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.

4.65. The implementation of the above measures will enable of target reduction in regulation CO2 emissions of 101% 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 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 - Strategic Policies (“LPP1”) (November 2012)
 - The Local Plan: Part 2 - Development Management Policies (“LPP2”) (January 2020)
 - The Local Plan: Part 2 - Site Allocations and Designations (“LPP2”) (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 London Plan, published March 2021, provides the spatial development strategy for London which deals with matters of strategic importance to Greater London. The London Plan is based upon three principle purposes for the Greater London area:

- Promoting economic development and wealth creation;
- Promoting social development; and
- Promoting the improvement of the environment.

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)
- Draft Good Quality Homes for all Londoners (October 2020)
- Draft Circular Economy Statements (October 2020)
- Draft Whole-life Carbon Assessments (October 2020)
- Draft 'Be Seen' Energy Monitoring Guidance (October 2020)
- Draft Public London Charter (October 2020)
- Other guidance: Energy Planning Guidance (updated April 2020), 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 will be controlled in Hillingdon up to 2026.
- 5.13. The two sections of the Local Plan forms 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. The 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. The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and the Policies Map. The Local Plan Part 2 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 Local Plan Part 2 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 “Hayes Housing Zone” (HHZ) designation under the LB Hillingdon LPP2 Policies Map (2020). The HHZ is expected to deliver a significant proportion of the Council's housing requirement; this estate expected to be a significant contributor.
- 5.18. 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
 - Design Approach
 - 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. The site also falls within the 'Hayes Housing Zone' designation under the Hillingdon Local Plan Part 2. The HHZ is expected to deliver a significant proportion of the Council's housing requirement, this estate being recognised as an important housing contributor in that context. 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 2021 similarly recognises the important role of the redevelopment and intensification of existing housing estates. 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.
- 6.6. 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, in demonstrating how the application proposals comply with LP Policy H8 (parts C, D and E, in particular), are set out later within this section.
- 6.7. 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 Statement of Community Involvement as submitted.

- 6.8. 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 within Section 8 and detailed further within the submitted Economic Impact Assessment and 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).
- 6.9. 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.
- 6.10. The Site is located within the HHZ and in close proximity to Hayes Town Centre where higher densities are actively supported and a significant proportion of the borough's housing requirement is expected to be delivered.
- 6.11. 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 London Plan (as amended in 2011). The recently adopted London Plan (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 London Plan.
- 6.12. This 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 this estate offer that unique opportunity.
- 6.13. The Site is located in a highly sustainable location which is identified to have capacity for regeneration and

a level of growth at densities greater than existing. The Proposed Development demonstrates that the redevelopment of the Site has the potential to deliver 240 new homes (52.5% 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 has been determined as appropriate through the various technical impact assessments that have been prepared to inform the design development of Illustrative Masterplan and outline parameters submitted in support of the HPA (as explored further in the following sub sections).

- 6.14. 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 the Hayes Housing Zone. The principle of redevelopment to provide replacement and additional housing is therefore considered to be acceptable in the context of local, regional and national planning policy.

Residential Uses (Quantum and Density)

- 6.15. 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, taking in to 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."*
- 6.16. This approach to density in support of land optimisation is also evident through the adopted London Plan (2021) which removes the former London Plan 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 London Plan 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.

6.17. 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 LLP2 which reflects the former Density Matrix of the former London Plan (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 Opportunity Areas where high density development is more suited.

6.18. The Site is situated within the Hayes Housing Zone and a short distance from Hayes Town Centre, within which the circumstances for high density development as set out above, entirely apply.

Illustrative Masterplan

6.19. 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 30 units and the Outline Area based on the established parameters, comprising a maximum residential floorspace of 14,456 square metres (GIA) which indicatively equates to 210 units. Across the Illustrative Masterplan, a total of 240 new homes would replace the existing 144 units on the estate, resulting in an uplift of 96 units. In density terms, this results in 224 units / hectare.

6.20. A strong design-led justification supports this level of density driven also by the quantum required to meet the estate's housing needs and achieve additional affordable (and private sale) homes to enable viable regeneration. Notwithstanding the low PTAL of the site, there are bus connections in close proximity to the site providing excellent links to Hayes Town Centre and Hayes and Harlington Railway Station. This further justifies the density of the current proposals at this location. The following sub sections demonstrates further that this level of optimisation is considered appropriate when considering site-specific characteristics.

- 6.21. The submitted Design and Access Statement and Townscape and Visual Impact Assessment (“TVIA”) provides further detail on how the Illustrative Masterplan has been designed to respond to the wider considerations such as scale and the submitted technical impact assessments demonstrates 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.
- 6.22. The proposed density across the Illustrative Masterplan is therefore considered entirely appropriate for this highly accessible location and will be significant in delivering much needed replacement and new affordable (and private sale) homes to address the critical housing needs across both the borough and London-wide as identified in national, London Plan (LP Policy H1) and local planning policy (LPP2 Policy). Indeed, with the introduction of the Standard Method 1.1 (with the Urban Centres Uplift applied), which identifies a need for 3,651 homes per annum within the borough, Hillingdon faces a significant pressure to deliver more homes and high densities must be promoted at existing brownfield sites to achieve this need and demand commensurate with the development’s impact, mitigation and enhancement. This estate regeneration represents a significant housing contributor in that context.

Detailed First Phase

- 6.23. In terms of the Detailed First Phase only, it comprises Block A located at the existing, under-utilised garages within the far western part of the estate (west of the existing residential towers). Block A has a proposed height of 5 storeys and will provide 30 homes, 2,226 square metres of residential floorspace and 99 habitable rooms.
- 6.24. The site area of the Detailed First Phase, as defined by the dotted red line measures 0.14 ha. This therefore results in a density of 214 units / hectare. As above, a strong design-led justification supports this level of density driven also by the quantum required to meet the estate’s housing needs and achieve additional affordable homes across the Borough.
- 6.25. The proposals for the Detailed First Phase are wholly in-keeping with the density rationale for the Illustrative Masterplan and the Site’s sustainable location. Through early delivery, it will set the context for the regeneration of the wider estate and future Reserved Matters Application in accordance with the objectives of national, regional and local planning policy.

Affordable Housing

- 6.26. 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.
- 6.27. London Plan 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 aim which for major developments should be in accordance with the threshold approach set out under LP Policy H5's Threshold Approach. 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.
- 6.28. 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 (i.e. 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. 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).
- 6.29. 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.
- 6.30. 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 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

- 6.31. 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.
- 6.32. The Illustrative Masterplan comprises a maximum (GIA) residential floorspace of 16,682 square metres which equates to 240 residential units and 720 habitable rooms based on the indicative unit mix. Of this, 8,760 square metres is affordable housing floorspace, equating to 117 units and 393 habitable rooms. This accounts entirely for replacement affordable housing provision in the form of Social Rent units, with the Applicant committing outright to an overall affordable housing provision of 52.5% 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.
- 6.33. 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 121 affordable units which comprise 484 habitable rooms and cover an area of 7,755 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 6.32, the Proposed Development will result in Social Rent replacement in the existing affordable housing provision to provide a total of 117 units, 393 habitable rooms and 8,760 square metres of floorspace. There is a slight reduction in homes (by 4 units) and habitable rooms (by 91 habitable rooms) as a result of there being a high habitable room to unit type ratio within the existing estate. The proposals seek to deliver larger replacement units but in line with typical unit layouts and designs they comprise less habitable rooms per unit type, in comparison. Nonetheless, it is important to note that there is a net gain in affordable floorspace by 1,005 square metres ensuring equivalent, plus uplift, in accordance with LP Policy H8. The proposals also offer a vastly improved affordable housing mix which responds directly to the existing and expected needs of the existing residents and the surrounding area.

- 6.34. In accordance with London Plan 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.
- 6.35. In terms of affordable tenure, 100% of the affordable provision will come forward as Social Rent. 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, over and above that for intermediate products.
- 6.36. Furthermore, the tenure mix for the Outline Area is indicative and will be fixed at the point of future Reserved Matters Applications 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 as 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 has been submitted as part of this HPA on the basis of the indicative unit mix for the Outline Area of the HPA.
- 6.37. 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. A Financial Viability Assessment ('FVA') submitted in support of this Hybrid Planning Application recognises that the proposed 52.5% total affordable provision is not viable. This includes both the re-provision and the "uplift" of affordable provision over and above replacement floorspace. However, the Applicant is fully committed to the proposed 52.5% affordable housing offer (based on floorspace) across the Estate in order to facilitate the delivery of good quality affordable new homes within the Borough which is a significant socio-economic and housing benefits 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

- 6.38. 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 entirely of affordable housing provision. All 2,226 square metres of the proposed residential floorspace will be affordable (100%). This comprises 30 affordable units and 99 habitable rooms, all in Social Rent tenure as replacement homes for returning residents.

Dwelling Mix

- 6.39. 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"*.
- 6.40. 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 *"...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"*.
- 6.41. 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 marked housing needs, the SHMA similarly identifies a need for larger units, particularly three bedroom (61%), four bedroom (18%) and two bedroom (17%) properties.

Illustrative Masterplan

6.42. The proposed unit mix that underpins the Illustrative Masterplan is indicative on the basis of a maximum residential floorspace of 16,682 square metres. As set out in Table 23 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 14,456 square metres and fixed unit mix for Detailed First Phase based on 2,226 square metres of residential floorspace.

Table 23: Cumulative (indicative) housing size and tenure mix across Illustrative Masterplan

	1 Bed	2 Bed	3 Bed	4 Bed	Total
Social Rent Replacement Homes	29 no. 58 hr 1,478 sqm	55no. 165 hr 4,114 sqm	28.no. 140 hr 2,552 sqm	5 no. 30 hr 616 sqm	117 no. 393 hr 8,760 sqm
Private	56 no. 112 hr 2,840 sqm	60.no. 180 hr 4,410 sqm	7no. 35 hr 672 sqm	N/A	123 no. 327 hr 7,922 sqm
TOTAL	85 no. 170hr 4,318 sqm	115 no. 345 hr 8,524 sqm	35 no. 175 hr 3,224 sqm	5 no. 30 hr 616 sqm	240 no. 720 hr 16,682 sqm

6.43. On the basis of the indicative cumulative mix across the Illustrative Masterplan, the Proposed Development provides for 35% of one bedroom units, 48% of two bedroom units, 15% of three bedroom units and 2% of four bedroom units. This mix is largely driven by the Estate's own assessed housing needs in terms of re-provision with also alongside need and demand, to include current market trends, for certain unit types across the private sale tenure.

6.44. This cumulative mix has informed the Indicative Unit Range Mix (%) for the estate as a whole, as can be seen in Table 24 below. Whilst only indicative, Tables 23 and 24 will guide any future Reserved Matters Application 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 24: Indicative Unit Range Mix (%) across the Illustrative Masterplan

	1 Bed	2 Bed	3 Bed	4 Bed
Indicative Unit Range (%)	15 - 35%	28 - 48%	13 - 15%	0 – 2 %

6.45. In accordance with LP Policy H10, the Site's sustainable 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 13-15% 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. This closely aligns with what has recently been consented on similar development sites within close proximity, to include at Silverdale Industrial Estate and Chailey Industrial Estate which are providing 17% and 15% family sized units (three bedroom plus) respectively, 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 locations, and ultimately key to scheme deliverability in viability terms (alongside grant).

Detailed First Phase

6.46. Table 25 below sets out the fixed unit mix proposed to come forward as part of the Detailed First Phase which will deliver 30 new homes across Block A.

6.47. 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 wider 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. This has resulted in a higher provision of family homes (three and four bedroom units) upfront at 24% of the mix, all of which will be affordable. Alongside this and in-keeping with the Site's sustainable location, 23% of the units will be one bedroom and 53% of the units will be two bedroom which is considered wholly appropriate in planning policy terms.

- 6.48. This forms part of the 240 unit total of the Proposed Development and fully complies with the cumulative unit mix set out in Table 23 above.

Table 25: Housing size and tenure mix across Detailed First Phase

	1 Bed	2 Bed	3 Bed	4 Bed	Total
Social Rent Replacement Homes	7 units 14 hr 358 sqm	16 units 48 hr 1,166 sqm	5 units 25 hr 446 sqm	2 units 12 hr 256 sqm	30 units 99 hr 2,226 sqm
Private	N/A	N/A	N/A	N/A	N/A
TOTAL	7 units 14 hr 358 sqm	16 units 48 hr 1,166 sqm	5 units 25 hr 446 sqm	2 units 12 hr 256 sqm	30 units 99 hr 2,226 sqm
TOTAL (%) (based on unit no)	23%	53%	17%	7%	100%

Housing Design Standards and Quality of Accommodation

- 6.49. 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.
- 6.50. 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. 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.
- 6.51. 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*".

- 6.52. 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

- 6.53. 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 Reserved Matters Applications. 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.
- 6.54. In demonstrating how the above can be successfully delivered across the maximum residential floorspace (GIA) of 14,456 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.
- 6.55. 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 68% 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 26 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 Reserved Matters Applications on a zone by zone / phase by phase basis.

Table 26: Indicative Unit Sizes across the Illustrative Masterplan

Unit Type	Nationally Described Space Standard	Indicative Unit Size
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)	79	88
2 Bedroom 4 Person (House)		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

6.56. 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 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.

6.57. 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.

6.58. 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 discussed in further detail later on in this section in relation to the layout, height and massing considerations of the design.

- 6.59. 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.
- 6.60. 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 Reserved Matters Applications.
- 6.61. 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

- 6.62. The Detailed First Phase sits within the outline parameters and 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.
- 6.63. 17 of the 30 units proposed to come forward across Block A will be dual/ double aspect. This equates to 57% 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.
- 6.64. As evident from the Table 27 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 27: 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

- 6.65. In terms of privacy, Block A is set back off the adjacent Avondale Drive (primary vehicular route) by up to 4m of defensible space along the southern perimeters. This will comprise high quality landscaping to include new tree planting as well as public realm to include a pedestrian friendly route. The ground floor units are protected further through the provision of private gardens which will sit across the perimeter of the property and away from the pedestrian walkway. Here the combination of private gardens plus defensible planting will provide an appropriate physical, visual and acoustic buffer from Avondale Drive,

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.

- 6.66. In terms of overlooking, the 'L shaped' layout of Block A has been arranged to ensure that there are 21 metre separation distances achieved for all habitable windows. As a result, there it is unlikely that the proposals will result in loss of privacy or overlooking between units within the Detailed First Phase itself. In respect of the relationship with neighbouring properties, Block A has been set back from the adjacent school to the west to ensure a 29.9m separation distance with the existing built form at Minet Infant School, as the closest property of relevance to the Detailed First Phase.
- 6.67. Furthermore, and in futureproofing the Proposed Development, the outline parameters have been designed to ensure a minimum 21 metre separation distance between the (western) outer building footprint of the Development Zone 2 of the Outline Area and the facing elevation of proposed Block A within the Detailed First Phase. This therefore accords with LBH LPA's HDAS and will prevent any risk of overlooking and loss of privacy and therefore in accordance with the Council's guidelines in this respect.
- 6.68. 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

- 6.69. 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*".
- 6.70. 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'.

- 6.71. 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

- 6.72. 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 16,682 square metres and indicative 240 unit provision, 24 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.

- 6.73. 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 Reserved Matters Application 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 24 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

- 6.74. 1 unit (3%) within the Detailed First Phase will be wheelchair user assessable and designed to meet Building Regulation M4(3). This 2-bedroom, four-person unit will be located at the ground floor of Block A as set out in Table 28 below. The unit will be affordable and allocated as a Social Rent replacement unit. All other units have been designed to meet Building Regulation requirement M4(2) as accessible and adaptable dwellings.

Table 28: Proposed Wheelchair User Dwelling Mix

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

- 6.75. All homes are to be designed so that they meet the National Technical Standards, and the relevant Building Regulation standards. 10% of all homes estate-wide will be designed to be wheelchair accessible. Final unit layouts will be determined through future RMAs for the Outline Area, with the Detailed First Phase subject to fixed and final unit layouts as part of this application and which demonstrate compliance with the above to include 1 no. (3%) wheelchair accessible units.
- 6.76. The indicative masterplan 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.

Design Approach

- 6.77. 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.”*

- 6.78. 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.
- 6.79. 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.
- 6.80. 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.
- 6.81. 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.

- 6.82. A design-led approach has been taken in order to understand the Site's capacity for growth and create a high quality new residential environment. 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. 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 and in relation to the impact from key views. This is in addition to retaining and creating areas of open space, public realm and pedestrian / cycle routes through the Site.

Layout

- 6.83. 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. 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.
- 6.84. 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"*.
- 6.85. 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

- 6.86. The layout comprises eight blocks which are distributed across three development zones across the Site. These blocks are bounded by Avondale Drive to the south as the estate's primary movement corridor which creates a defined boundary which runs through the southern perimeter of the Site. The proposed development is interspersed with new areas of public realm and landscaping, with greening and planting to include around the perimeters of the blocks as well as new landscaped areas.
- 6.87. The western block, Block A, is an L-shaped standalone building and comprises the detailed element of the application, as discussed in more detail below.
- 6.88. The second development zone, located across the eastern portion of the Site features two L-shaped blocks and one connected smaller rectangular block which together enclose a central area of green amenity space, open to the north and south to promote legibility and permeability across the site into Hitherbroom Park to the North. This Zone relates to Blocks E, F, G and H.
- 6.89. Blocks B, C and D comprise the third development zone within the central portion of the site. Blocks B and C are separated by a communal courtyard, although linked across their northern elevation. Block D features as a standalone rectangular block to the east, with a 21m separation distance established between directly on facing windows from Block C.
- 6.90. 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 LP Policy D3 and DMHB11. The Development Zones, as established through Parameter Plan 1, 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 an average separation distance of 21 metres between the outer building footprints along the southern elevations of the proposals and the existing terraced properties to the south of Avondale Drive to ensure adequate separation between habitable rooms.

- 6.91. 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 1. 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.
- 6.92. 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.
- 6.93. 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 Hitherbroom Park in accordance with LBH and GLA guidance received at the pre-application stage. 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

- 6.94. The Detailed First Phase comprises the stand alone block at the western end of the site. The built form comprises one L-shaped block at 5 storeys in height with a communal landscaped garden area located within the north eastern corner of the red line boundary of the detailed element. The garden area will provide communal (private) external amenity space to serve future residents. This will include child's play space.
- 6.95. In line with principles evident across the Illustrative Masterplan, the configuration of Block A 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 repetition 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 school and nursery uses to the west and the smaller building floorplates of residential properties to the south. 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.
- 6.96. Block A provides a strong new frontage onto Avondale Drive which becomes active at ground floor as the block extends into the Site. As sought by LP Policy D3 in contributing to the experience of a place, this creates interest and liveliness within the street scene which responds positively to adjacent frontages and is continued into the estate through the extension of a pedestrianised pathway which runs along the eastern boundary of the block towards the communal garden area to the north. This comprises a new areas of public realm and landscaping which not only contribute to the greening and sustainable drainage management of this first phase but also performs as defensible space. It allows for the further internalisation of the private residential environment of Block A, physically and visually assisting in the definition the extent of the public environment in accordance with LP Policy D3.
- 6.97. Two different detailed designs are proposed for defensible space around the perimeter of the Phase 1A building. Each edge condition has been designed appropriately to its location and contribute to the sense of place. Duplex homes along the street edge will be provided with defensible space at ground floor level. A 600mm PPC metal railing on a 300mm brick base will sit behind planting, providing a soft edge and privacy from the street. The planting will be located on the outside of the public realm and maintained by

the estate management company. This should ensure the boundary remains well maintained and consistent.

- 6.98. Duplex homes are proposed to use the communal enclosed bin store to maximise usable front garden space and reduce the presence of bin enclosures along the street. Entrance doors will be recessed by a minimum of 900mm and will be accessed by a 1.5m wide path. The recess will include signage to identify each property number.
- 6.99. Two homes benefit from ground floor garden space which face onto the communal courtyard. A minimum 2m strip of defensible space is proposed to the edge of the rear gardens to give privacy to homes. A 900mm PPC metal railing will sit in front of planting, providing a soft edge to the courtyard. A 300mm gravel strip is provided at the edge of all buildings for maintenance purposes.
- 6.100. 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 Policies DMHB1. 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)

- 6.101. 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.
- 6.102. 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 ; 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.

- 6.103. Outline planning permission is sought for heights between 5 and 10 storeys. The Outline Area therefore has the potential to comprise “tall” buildings in accordance with the LP D9 definition (i.e. 6 storeys and above) and the maximum height parameters have been established on this basis, as can be seen from Parameter Plan 2. Although the Detailed First Phase comprises a height of 5 storeys and so therefore does not constitute as a “tall” building, the Proposed Masterplan does trigger the requirements of LP Policy D9 and LPP2 Policy DMHB10.
- 6.104. In terms of addressing the first of the policy requirements, the Site is located within close proximity to Hayes Town Centre which LPP2 Policy DMHB11 identifies HTC as an appropriate location for tall buildings. Importantly, the existing estate contains three, 13 storey residential towers. This is equivalent to 10 storeys today when considered against current floor to ceiling height standards for residential development and establishes a strong 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 at this location notwithstanding the important planning and public benefits created as a result of the regeneration itself.
- 6.105. 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 criterion. 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 Town and Visual Impact, Daylight, Sunlight and Overshadowing, Wind and Microclimate, Noise, Air Quality, Fire and Servicing, Transport, Aviation and Design and Access Statement.

Illustrative Masterplan

- 6.106. 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. It establishes the repetition of heights of five and seven storeys across the site, with

a taller 10 storey element located towards Hitherbroom Park.

- 6.107. Visually, the distribution of the height across the Site is considered to respond well to the surrounding context with the tallest 10 storey elements positioned at the northern boundary of Site, adjacent to Hitherbroom Park, where massing would be at the furthest point away from smaller scale existing residential properties sitting outside of the Site. This includes the 2-3 storey terraced properties along the southern side of Avondale Drive which sit directly to the south of the estate and where the Proposed Development will sit at a consistent 5 storey height along this boundary which better relates to that of the adjacent properties. Within the centre of the Site, the greater height is concentrated at the northern boundary with consistent punctuations to provide movement corridors through the Site. The stepping down of the perimeter blocks along the southern 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.
- 6.108. The submitted Townscape and Visual Impact Assessment (TVIA) has assessed the visual impact of the Proposed Development within 12 views (to include long-range, mid-range and immediate in accordance with LP Policy D9) and considered it in the context of immediate sensitivities as well as the wider townscape which is considered to be of low sensitivity. 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, which in general is of low sensitivity. The considered design is particularly evident in its relationship with the park adjacent to the north, as well as the immediate context of the buildings on the other side of Avondale Drive. The proposed development will be most prominent from Minet Country Park, but will be lower than the existing buildings on the site.
- 6.109. The TVIA identifies that the Proposed Development together with the surrounding developments, therefore provides the opportunity to promote legibility within its immediate landscape, improving its sense of security as well as the wider public realm, thereby contributing to the enhancement of this townscape and visual amenity along Avondale Drive. There is a clear public connection to Hitherbroom Park through the site, increased active frontages along the street and the height is reduced, to fit in more with the context.
- 6.110. 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.

- 6.111. In terms of functional impact, a Detailed Fire Statement and Outline Fire Strategy has been submitted as part of the HPA. This demonstrates 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. 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, 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.
- 6.112. 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"*.
- 6.113. With respect to environmental impact, the HPA comprises a Wind and Microclimate Assessment, Daylight, Sunlight and Overshadowing Assessment, Noise Impact 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 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.
- 6.114. 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

- 6.115. 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)*”.
- 6.116. 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*”.
- 6.117. The Mayor’s Housing SPG explains that 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). As such “*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 approach in decision-making.
- 6.118. 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*”.
- 6.119. 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.

- 6.120. 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 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 Plan 2, are considered to demonstrate a positive design response to the nearest residential receptors. This concentrates massing at the northern end of the Site, where the distance from the existing housing along Avondale Drive to the south is greatest, and stepping down in scale along the southern and western boundary of the Site to respect the lower storey buildings along Avondale Drive.
- 6.121. It is important to note that in undertaking this assessment, the Detailed First Phase and Outline Areas 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

- 6.122. 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 along the south of Avondale Drive, the apartment block at 1-24 Gade Close to the south, the Minet Infant School to the west and the residential apartment building at 1-17 Clivesdale Drive to the south west of the site.
- 6.123. In terms of the adjacent Minet Infant School and in assessment of the Illustrative Masterplan, the VSC assessment demonstrates that the majority of windows will retain 0.8 times their former level with the proposals in place and therefore satisfy the BRE target levels. Where effects occur below this level, these are limited to windows facing towards the scheme set beneath a canopy. As a result, these windows are reliant upon low levels sky views across the site such that any meaning development at the site would result in changes below the BRE recommendations. The VSC / NSL results with the Maximum Parameter scheme in place show that the effects are similar and as the effects are limited to technical deviations in regard to the VSC, and these classrooms experience no noticeable change in daylight penetration to the space, the effects are considered in line with the BRE guidelines for VSC/NSL daylight.
- 6.124. These windows serve rooms that contain multiple windows. Paragraph 2.2.6 of the BRE guidelines states that where rooms are served by multiple windows, the mean VSC effects may be considered and on this basis, the VSC effects are in accordance with the BRE guidelines. The limited effect on the school's daylight is confirmed by the NSL analysis which shows all rooms to retain daylight distribution levels compliant with the BRE targets, within 0.8 times the existing position.
- 6.125. With regards to sunlight effects, based on the Illustrative Masterplan, the neighbouring school will either meet the BRE targets of at least 25% for total annual sunlight levels and 5% for winter, retain at least 0.8 times their former level or are limited to changes within 4%. As such, there will be no material effect on sunlight as a result of the Illustrative Masterplan scheme.

- 6.126. The assessments of the part 3 / part 2-storey block of flats at 1-17 Clivesdale Drive demonstrate that there will be no noticeable change in daylight to this property in respect of the sky view to the windows or the daylight penetration to the space with all rooms retaining at least 0.8 times their existing level for VSC and NSL daylight. The daylight effects based upon the Maximum Parameter Scheme are virtually the same and therefore the effects to this neighbouring building are considered consistent with the recommendations for VSC / NSL daylight under the BRE guidelines.
- 6.127. The apartment block at 1-24 Gade Close to the south currently enjoys outlook between the 2 existing towers Fitzgerald & Glenlister House with gaps in between and low rise, single parking areas. The results from the Vertical Sky Component (VSC) assessment demonstrate that all but three of the windows across the front elevations will retain levels within 0.8 times the existing position and therefore comply with the BRE targets. The two affected ground and first floor windows are secondary windows to the bays and have low VSC levels in their existing condition due to their enclosed / recessed position. The one remaining deviation is a minor change in sky view to a kitchen at ground level at 0.7 its existing level. Given the window serves a small kitchen at c.6m² this is not considered to result in significant harm. The BRE state that the main windows of bays should be the focus when considering the VSC effects and as they experience no noticeable reductions retaining 0.8 times their former level, these effects fully meet the BRE target levels for VSC. In terms of the effects based on the Maximum Parameter scheme, the VSC results confirm a large majority of the principal windows overlooking the site will retain at least 0.8 or be limited to minor transgressions in sky view at 0.7 times their existing level. It is important to acknowledge that the full extent of the Maximum Parameter massing will not be developed in its entirety and will be developed in detailed design to reflect the design code and planning guidance.
- 6.128. The No Sky Line (NSL) results show that most of the habitable rooms retain daylight distribution levels in accordance with the BRE guidelines retaining 0.8 times or experience minor shifts at 0.7 times their existing level. Where there are proportional reductions beyond this level, these are isolated to 4 'galley style' kitchens and 3 living rooms between ground and second level. The kitchens effects will have limited impact on the use and amenity of the space given its size and whilst there are reductions in daylight penetration to a sample of living spaces, retained daylight levels are reasonable where c.50% of room area maintains sky visibility and retained VSCs are upwards of 20% and as such, above that typically accepted for a developing urban environment.

- 6.129. There are minimal impacts to the properties along Avondale Drive, which includes numbers 29-33, 113-125 and 127-133 Avondale Drive. The results for the Illustrative Masterplan and Maximum Parameter schemes show that the large majority of windows meet the BRE recommendations achieving at least 0.8 times their existing level. One notable exception is the site facing windows which fall below the targets at the ground level of 133 Avondale Drive. Despite this, these effects are to secondary windows and the rooms served by these windows are principally lit by windows within the eastern elevation which retain VSCs between 25-26% which is high and in excess of the 'mid-teens' level broadly considered to be typical of urban locations.
- 6.130. Overall, the impacts are considered typical and 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). Therefore the properties will still achieve satisfactory levels of residential amenity and the Proposed Development is not considered to result in any unacceptable harm.
- 6.131. Given the proposals seek to optimise the estate's regeneration potential, there will inevitably result in a degree of change for the surrounding built environment. However, it is considered that the maximum (and indicative) parameters demonstrate a positive design response to the nearest residential receptors in seeking to not adversely impact on neighbouring amenity in accordance with London Plan Policy D6. The scheme is considered to be in line with the intentions and specific flexibilities set out in the BRE guidance and the design works hard to directly respond to the nearby neighbours whilst maximising housing delivery at the site. This is reflected by the limited effect to the vast majority of the residential properties included in our assessment, as well as the neighbouring primary school. The effects of the proposal are therefore considered to be acceptable for a developing urban context.

6.132. In terms of the potential overshadowing effects, the Hitherbroom Park and the Minet School playgrounds 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 spaces show that there will 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, almost all of these spaces will continue to enjoy over 2 hours of direct sunlight on the 21st March and will not experience material overshadowing as a result of the proposals.

6.133. 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 and 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

6.134. The assessment of daylight (ADF) to the detailed proposal at Phase 1A has shown that the all but 1 of the habitable rooms receive good levels of amenity in line with the BRE recommendations with the Illustrative Masterplan in place. Here, 102 (99%) of the 103 habitable rooms achieve at least 2% for a kitchen, 1.5% for a main living space and 1% for a bedroom. Whilst 1 room is below the 2% BRE target for a kitchen this is a minor transgression which would not be recognisable to the residents thus acceptable. Overall, this is an excellent level of compliance for internal daylight amenity.

- 6.135. With the Maximum Parameters in place, all but 3 (96%) of the rooms achieve the BRE targets levels with 3 rooms below the recommendations for ADF. These are similarly limited to exceptionally minor deviations of between 0.1-0.2% which would not be perceptible to the occupants. 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. Given the isolated nature of these effects these are considered acceptable and in line with the BRE recommendations for internal daylight amenity.
- 6.136. Sunlight levels for proposed accommodation is naturally lower for flatted developments in urban locations as sunlight availability is driven by the orientation of the building. Given the layout of the site, inevitably there are spaces with a less southerly aspect but the scheme has been developed to maximise the number of units provided with dual aspect and / or a southerly outlook where possible.
- 6.137. Sunlight compliance is comparable with both the Illustrative Masterplan and the Maximum Parameters in place. When considering all of the main living spaces, 56% of the living spaces achieve the BRE recommendations for APSH. When considering only the living rooms within 90o of due south, which the BRE acknowledge are the main the focus for sunlighting, compliance levels increase to c.70%. This is a good level of compliance for an urban regeneration scheme and is indicative of the high quality design. Where there are units below the targets for sunlight, these are due to the provision of private balconies which both the BRE and the Mayor of London recognise should be given flexibility as whilst these enhance the quality of the units, these do inevitably lead to lower amenity levels.
- 6.138. The VSC façade analysis for the outline areas based on the Illustrative Masterplan scheme and the Maximum Parameters demonstrate that there is potential for the detailed proposals to achieve high levels of compliance for internal daylighting. The vast majority of elevations receive VSCs in excess of 27% and where there are lower levels, these are mainly isolated to the corners of courtyards which are typical for courtyard development or to a corner of the Maximum Parameters Phase 2. In both instances, these could be addressed through considered detailed design adopting similar principles to that demonstrated in phase 1A detailed application.
- 6.139. 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 Detailed First Phase plus maximum parameters for the Outline Area and therefore includes the Courtyard amenity space

at Phase 1A; the proposed podium amenity at Phases 2 & 1B and the wider ground level amenity across the front of the site. The results of these assessments show that the wider ground level amenity space will enjoy high levels of sunlight throughout the year in accordance with the BRE recommendations in the Illustrative Masterplan and Maximum Parameter scenario. The shared courtyard space at the podium of Phase 1B also demonstrates good levels of sunlight on the 21st March, comfortably exceeding the BRE recommendations with 67% of the space receiving 2 or more hours of sunlight.

- 6.140. The results for the courtyards at Phase 1A & 2 on the 21st March show that both of these amenity spaces will receive more than 2 hours sunlight to at least 30% of each of the spaces. Whilst these spaces experience sunlight levels below the recommended targets on the 21st March, the sunlight exposure diagrams on this date illustrate that large areas are on the cusp of the 2 hours threshold with the majority of the space achieving at least 2 hours of sunlight on the 21st June during the summer when they may most be used. Given large areas of the courtyards will be just below the 2-hour threshold, these deviations are considered minor and would have little impact on the quality / use of the space across the year.
- 6.141. When considering the proposed amenity areas as a whole, at least 71% of the entire amenity provided within the proposed development will achieve at least 2 hours sunlight on the 21st March and will meet the BRE recommendations for sunlight amenity.
- 6.142. In turn, when considered comprehensively, the Proposed Development is considered to provide a range of good quality external amenity and public open spaces which will receive sufficient levels of sunlight at appropriate times in the year 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. 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 Reserved Matters Applications for the Outline Area.
- 6.143. 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

- 6.144. 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*”.
- 6.145. 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.
- 6.146. 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.
- 6.147. 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 Reserved Matters Applications. 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.
- 6.148. 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 and LPP5 DHMB12. .

Private Amenity and Play space

- 6.149. In encouraging the delivery of high quality housing development, 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 onto 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).
- 6.150. 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.
- 6.151. 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”*.
- 6.152. 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 Play space Calculator which should be used to determine the quantum of playspace to be provided based on child occupancy.

- 6.153. 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*".
- 6.154. 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).
- 6.155. The Options Appraisal (October 2020), prepared by Savills in support of the Case for Regeneration (as discussed further in Section 3) found that the lack of private amenity space was a key design feature that contributed to the concerns of residents regarding the existing Estate. Indeed, the vast majority of the homes at Avondale Drive do not have any private amenity space such as a garden or balcony. 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

- 6.156. 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 rear terraces for ground floor and podium level units. The ground floor front gardens will be set back off adjacent primary and secondary vehicular routes, via a 4m 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 public realm to include a pedestrian friendly route. 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.
- 6.157. The proposed private amenity provision, which equates to 2,623 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 Reserved Matters Applications will therefore determine the exact quantum that is required based on the final unit mix per zone and/or phase.
- 6.158. 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. 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.

- 6.159. 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 1,464 square metres of communal (private) amenity space is proposed estate-wide, as shown on the Illustrative Masterplan. This comprises a courtyard garden within the detailed Phase 1a element, as well as podium gardens and dedicated ground floor courtyards configured between blocks as part of the Development Zones 2 and 3, as established on Parameter Plan 4 for the Outline Area and the detailed drawings for the Detailed First Phase. These spaces will incorporate a combination of quiet areas for recreational activity, seating and resident gathering, the potential for community growing area 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 the benefit from overlooking in the interest of maximising safety and usability.
- 6.160. In terms of play space, a total of 994 square metres of children's play space is proposed estate-wide. This comprises 814 sqm of play for children aged 0-4 years and 180 sqm for children aged 5-11 years, as set out in Table 12 of Section 4 of this Planning Statement.
- 6.161. Further detail on the strategy to include the on-site typologies per age group and distribution of these across the estate, is set out within the submitted Design and Access Statement and 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 Reserved Matters Applications.
- 6.162. 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 Play space Calculator (as evident from Table 12 in Section 4). However, this shortfall primarily relates to the older age groups, particularly 12+ years old, as the under provision under 5's is only very marginal at -28.0 square metres. It is considered that the play space provision 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. The Mayor's Plan 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). The Proposed Development achieves this through high quality, doorstep play within the communal podium garden plus the addition of provision within private external amenity space serving individual units.

- 6.163. 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 994 square metres of local playable space on the Site within the public realm and areas of public open spaces. This will be supplemented by potential off-site facilities located at the neighbouring Hitherbroom Park which is adjacent to the estate and Minet Country Park to the west, which lies within 400m of the site.
- 6.164. For older children (12+ years), Table 4.4 of the SPG states that this 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.
- 6.165. Minet Country Park to the west (within 400m) and Lombardy Children's Park to the north (within 800m) provide facilities for older children and comprises adequate provision to meet the demand generated from the Proposed Development. This approach is considered 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 and in order to meet their specific play, social and recreational needs which are unlikely to be able to be able to be wholly satisfied through provision on-site.
- 6.166. 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 and is therefore 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

- 6.167. Consistent with the Illustrative Masterplan, all 30 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 comprise of 887 sqm of private amenity space across ground floor front gardens, ground floor rear gardens and first floor and above balconies. 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.
- 6.168. The ground floor private front gardens will be set back off the adjacent primary and secondary vehicular routes, via a 4m 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 public realm to include a pedestrian friendly route. 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.
- 6.169. 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, 153 square metres of accessible doorstep play will be incorporated within the communal courtyard garden that sits within the North Eastern corner of the red line boundary for Phase 1a and will serve the under 5's of Block A. 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.
- 6.170. 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 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. 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

- 6.171. 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)).
- 6.172. 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.
- 6.173. 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). This 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.

- 6.174. 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.
- 6.175. 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.
- 6.176. 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; roads; verges and the occasional planters. 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

- 6.177. 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
 - 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;
- Manage surface water sustainably, and use Sustainable drainage systems (SuDS) features within the streets to promote the physical connection with the adjacent Hitherbroom Park;
- Provide local playable space within the courtyard and podium communal gardens, and informal “play-on-the-way” opportunities throughout the green streets and connecting spaces; and
- Be mindful of safety and security.

6.178. For the Outline Area, Parameter Plan 4 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 1,306 square metres of public open space, public realm and landscaping is proposed estate-wide. This equates to 13% of the Site and comprises an enhanced frontage along Avondale Drive, pedestrianised streets and other landscaped areas within the streetscene.

6.179. One of the key objectives of the landscape design along the northern boundary of proposed phases 1a, 1b and 2 is to introduce a series of private gardens, a ground-level communal residents courtyard (Phase 1a) and a first floor podium garden (Phase 2) along the boundary. The podium gardens will provide a combination of quiet areas for seating, opportunities for residents to meet (e.g. picnic tables), to share experiences (e.g. community growing areas), and to play.

6.180. The other key element of the landscape strategy is the enhancement of the northern boundary of the site and its relationship with Hitherbroom Park. The existing boundary between the site and the park is a palisade fence, with dense tree cover to the west and mixed shrub with scattered trees towards the east. Enhancement planting is proposed which will include off-site planting acting as a boundary treatment to off-site older play at the adjacent Park with design and landscaping details for approval by way of a later planning condition. The Avondale Children’s play area is located on the far northern part of the site, but with no meaningful connection with the adjacent park. The site proposals seek to open up this boundary and to connect the new homes with the adjacent parkland, providing space for amenity, play and for the community to connect with nature.

6.181. 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, meets and exceeds the Mayor's recommended 0.4 target score.

- 6.182. 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 and 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

- 6.183. The Detailed First Phase comprises 41 square metres of new public realm and extensive landscaping, along the perimeter of Block A. 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 and pedestrian walkways. It will provide a soft edge to the built form as well as the greening of the key frontages onto Avondale Drive.
- 6.184. Phase 1a will include the provision of a residents courtyard garden at the ground floor level, comprising 303 square metres of communal (private) space which includes 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.

- 6.185. 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 DMEI1. 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

- 6.186. 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”*.
- 6.187. 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.
- 6.188. 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.
- 6.189. 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 33 individual trees and three groups of trees 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

6.190. In order to facilitate the regeneration of the estate, on the basis of the Illustrative Masterplan, 27 individual trees and one group of trees will need to be removed. A total of 6 individual trees can 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 29 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 this on the basis of the Illustrative Masterplan.

Table 29: Existing Arboriculture Features for Removal and Retention

Category	Existing Number	Number for Removal	Number for Retention
Category A	2	2	0
Category B	22	16	5
Category C	9	7	1
Category U	3	3	0
Total	36	28	6

6.191. As is evident from the above, 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. In turn, a number of trees and features have been identified to be of most importance on the basis they provide high-level visual amenity as well as a notable contribution to the urban environment. These have been identified in discussion with LBH LPA's Landscape Officer and include the western boundary tree cover adjacent to Minet Junior School which will be retained and properly protected. Here, trees would be crown-lifted and slightly reduced to allow the buildings to be constructed, then a new shade tolerant hedgerow planted beneath as part of the landscaping scheme to provide reinforcement visual screening between the two sites. Indeed, during construction, all retained trees will be protected from harm in accordance with best practice as set out in detail in the submitted Arboricultural Impact Assessment.

6.192. 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 1. 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 such 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.

- 6.193. There are also a number of existing trees located on the southern boundary, fronting Avondale Drive. These are of medium value as category B trees of a moderate quality with an estimated remaining life expectancy of at least 20 years. Tree cover along Avondale Drive provides high-value tree cover in terms of landscape and visual amenity and efforts have been made through design team meetings during the evolution of emerging layouts to ensure trees are retained and incorporated wherever possible and practicable. However, the potential for retention of trees along the Avondale Drive frontage is limited and is due to a lack of suitable space for either sufficient rooting volume or canopy growth for new trees to maturity. 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.
- 6.194. 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 wider sustainability and environmental objectives of the Proposed Development.

- 6.195. 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

- 6.196. Five individual trees and one group of trees will need to be removed to accommodate the Detailed First Phase, however, 19 new trees are proposed to be planted which represents an increase of 217% in arboricultural features within the Detailed First Phase.
- 6.197. 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 poor quality 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 Avondale Drive which is otherwise primarily a hard landscaped built environment.
- 6.198. 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

- 6.199. 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). 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*”.

- 6.200. 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*”.
- 6.201. 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 DMEI7 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.
- 6.202. 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 includes a Biodiversity Net Gain (BNG) calculation to demonstrate 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.
- 6.203. There are no statutory sites of international importance within 5km of the site. There is however, one Local Nature Reserve (LNR) within a 2km radius, Yeading Meadows, located 1.5km north of site.
- 6.204. Records from GIGL also identified eight SINC within 2km of the site boundary. SINC are recognised by the Greater London Authority and London borough councils as important wildlife sites.
- 6.205. The PEA identified value for a number of notable and protected species and habitats, including bats (foraging, commuting and roosting), nesting birds, and hedgehog. Further surveys to establish the presence/likely absence of bats in the buildings were conducted as a number of buildings were identified

as having low potential to support roosting bats.

- 6.206. The results of these surveys indicated that three common pipistrelles (*pipistrellus pipistrellus*) were seen emerging/re-entering from three features on one of the existing buildings. The survey work has therefore confirmed the presence of three bat roosts within B7 and the necessary recommended mitigation actions are detailed within this report, which includes implementation of a 'bat sensitive' lighting strategy designed to minimise disturbance to the bats using the site. In addition, a Bat Low Impact Class Licence (BLICL) will be sought upon confirmation of planning permission and will likely be secured through an associated planning condition.

Illustrative Masterplan

- 6.207. 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 in a 46.62% BNG.
- 6.208. 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. This is not only soften the urban environment but to also establish a new green corridor north-south through the Site to connect to the existing habitat corridor that runs along the boundary of Hitherbroom Park. 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.
- 6.209. In various locations across the site, in-particular fronting Avondale Drive and Hitherbroom Park 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 local habitats. This will improve the biodiversity value of this part of the site and as a result of the combined public realm and landscape improvements, 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 LPP2 Policy DME17.
- 6.210. 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 Reserved Matters Applications 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; 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

- 6.211. 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 Block A as well as within the communal (private) courtyard garden. This will also host an insect hotel, with façade greening on Block A and biodiverse extensive green roofs extending the network of ecological features upwards.
- 6.212. 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.

Townscape and Visual

- 6.213. NPPF 197 c) states that "*the desirability of new development making a positive contribution to local character and distinctiveness*" should be considered.
- 6.214. 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.

6.215. 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. In addition, there are no heritage assets within close proximity of the site. Within its wider surrounding, to the south-west of the site, where the Hayes Town Centre is located, there are a number of Grade II listed buildings and locally listed buildings. Due to their distance and lack of intervisibility with the site, these assets are going to be scoped out of the TVIA.

6.216. In recognising 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. A Townscape and Visual Impact Assessment ("TVIA") 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

6.217. The TVIA confirms that 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.

6.218. As described in Section 2 and the submitted TVIA, 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, and it is therefore considered that there is ample scope for improvement through the regeneration of the estate.

6.219. 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.

6.220. The views analysis contained within the submitted TVIA demonstrates that the massing of the Proposed

Development scheme responds to both the immediate and the wider context of the Site. The proposed design enhances the Site's relationship with the park adjacent to the north, as well as the immediate context of the buildings on the other side of Avondale Drive. There is a clear public connection to Hitherbroom park through the site, increased active frontages along the street and the height is reduced, to fit in more with the context. The proposed development will be most prominent from Minet Country Park, but will be lower than the existing buildings on the site. As shown in the views study, the massing of the whole scheme responds well to both the immediate and the wider context of the site.

- 6.221. Overall, the Proposed Development is therefore considered to provide an opportunity to 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.
- 6.222. The TVIA 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

- 6.223. 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).
- 6.224. 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"*.

- 6.225. 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.
- 6.226. 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.
- 6.227. 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

- 6.228. 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”*. In this respect, NPPF 108 recommends that 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).
- 6.229. 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”*.
- 6.230. 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.
- 6.231. LP Policy T4 reinforces the importance of assessing and mitigating transport impacts through development proposals and requires transport assessments / statement 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”*.
- 6.232. In line with the above, the London Plan 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. 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.

- 6.233. 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.
- 6.234. 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*”.
- 6.235. 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.
- 6.236. 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 fully 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 for Avondale Drive Estate.

- 6.237. For the Outline Area, Parameter Plan 3 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 Proposed Ground Floor Plan sets out in finer detail the proposed access, parking and servicing arrangements that will serve residents of Block A. Together, these underpin the Illustrative Masterplan.

Access

Illustrative Masterplan

- 6.238. As evident from Parameter Plan 3, 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 key indicative routes run along the periphery of Development Zones 2 and 3, from North-South and East-West across the eastern portion of the Site. 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 pedestrian and cycle circulation around the site and better linkages to existing pedestrian and cycle routes within the surrounding area, providing an opportunity to connect the residential areas to the south and to Hitherbroom Park to the North.
- 6.239. At present the existing estate presents a barrier to such movement as a result of its layout and lack of defined routes through site. 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 Avondale Drive Estate in accordance with LPP2 Policy DMT5.

- 6.240. 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 future less mobile residents and servicing and deliveries. The primary vehicular access into the Site off Avondale Drive will therefore remain, however, it will be re-positioned slightly to the east so that it sits further within the Site and provides a more central movement corridor which will include pedestrian and cycle routes. For the larger block on the site's eastern edge, a one-way service road loops around the building to facilitate delivery and service access. This is proposed to lead off the primary corridor (Avondale Drive) and provide visual and physical breaks between Development Zones 2 and 3. 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.
- 6.241. As demonstrated through the submitted Transport Assessment, Parameter Plan 3 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

- 6.242. Block A is located in the far western portion of the site, with an existing vehicular access route taken from Avondale Drive, which loops around the rear of the existing estates as a service road to the on-site car parks. The only existing vehicular access point of the site falls within the red line boundary of the Detailed First Phase. As discussed above, this access point will be relocated to the east of the site to provide a one-way looping service road, which will form part of the outline application as detailed in parameter plan 3. As such, there will be a stopping up of the existing access onto the under-utilised car garages within the western portion of the site.
- 6.243. All pedestrian access into Block A will be gained through the secure entrances at street level. Landscaped pavements will be provided off Avondale Drive to facilitate this and connect back into the existing estate.

- 6.244. 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 existing vehicular access to the site off Avondale Drive will be removed to facilitate the construction of Block A. In the interim, temporary works will comprise a new access point from Abbotswood Way to facilitate resident access by car, bicycle and foot both around and into the existing residential blocks. During the initial construction stages of Phase 1a, car parking for residents will remain within the existing car parking areas. This temporary access will also serve construction traffic whilst Phase 1a is under construction. These temporary works will also include a temporary pedestrian access from Avondale Drive (prior to Phase 2 construction and occupation) as illustrated on the Phase 1a Proposed Ground Floor Plan. The temporary highway arrangement to include the temporary access from the east as Phase 1a is under construction, will be provided in detail as part of the planning conditional requirement for LBH LPA's later planning approval.
- 6.245. On the basis of the above and submitted details, the Detailed First Phase and associated temporary works 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 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

- 6.246. The submitted Transport Assessment considers the transport impact of the Proposed Development on the existing transport infrastructure, to include the local highway network and public transport. It is supported by an Active Travel Zone Assessment ("ATZA"). The ATZA has been undertaken to support the application on the basis of identifying pedestrian and cycle movement routes connecting the site with possible improvements to enhance public transport connectivity commensurate with the development impact itself and in compliance with Regulation 122 of CIL Regulations 2010 (as amended).
- 6.247. The Transport Assessment confirms that the vehicular impact of the development proposals is expected to be limited to 13 additional two-way vehicular trips in the AM Peak and 15 in the PM Peak, which constitutes a 6% and 11% increase above observed traffic flows along Avondale Drive. On this basis, the proposals are not expected to have a significant material effect on the operation of local highway network during peak

hours, and therefore, as agreed with LBH during pre-application discussions, no further capacity testing of the local highway network has been undertaken.

6.248. There is also expected to be an uplift in non-vehicular multimodal trip generation for the development proposals. Given the accessible location of the site, these trips will be distributed across a variety of routes and sustainable transport opportunities including rail, bus, cycling and walking and given the range of established services that are available, it is anticipated that this impact will be negligible on the operation of the highway and transport networks in the vicinity of the site.

6.249. On the basis of the above and the submitted Transport Assessment, the Proposed Development will therefore 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

6.250. A total of 82 car parking spaces are proposed as part of the regeneration of the estate, including 9 disabled bays for “Blue Badge” holders.

6.251. 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. Over and above this, 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 provision and its distribution is considered further below in the context of the Outline Area and Detailed First Phase.

Illustrative Masterplan

6.252. On the basis of the Illustrative Masterplan and the indicative unit mix, 68 no. spaces are proposed on-site located at ground level beneath podium areas serving the residential blocks. An additional 14 no. spaces

are to be provided on-street along the proposed vehicular routes within the Site, as defined through Parameter Plan 3. This equates to a ratio of 0.28 on-site car parking spaces per residential unit, plus the additional on-street provision which combined equates to a ratio of 0.34 car parking space per residential unit. Tables 15a - c found within the Development Specification Statement set out the maximum and indicative proposed car parking requirement on a Development Zone and block by block basis.

- 6.253. As noted above, it is acknowledged that the Site's location is within a PTAL Zone of 1-2, meaning that the maximum parking provision (for Outer London PTAL 1-2 areas) is up to 0.75 - 1 space per dwelling in accordance with London Plan Policy T6.1. The Proposed Development, inclusive of re-provision plus on-street parking will therefore sit below these levels established to be acceptable and is therefore in accordance with London Plan Policy T6.1.
- 6.254. In addition the provision of on-site car parking, there is the potential to implement additional on-street parking controls surrounding the Site. This would allow a restriction to be applied to new residents at the Site, or at least occupiers of the smaller 1-bed units, to restrict them from being able to apply for parking permits. This would then protect the rights of existing Site and off-site residents to be able to apply for parking permits, subject to agreement and support of the majority of existing residents. Nonetheless, it is important to note that its implementation is not necessary to make the development impact acceptable.
- 6.255. In terms of disabled persons parking provision, the Proposed Development will provide 8 'Blue Badge' spaces which equates 12% overall and therefore satisfies the requirements of LP Policies T6.1 and T6.5. Furthermore, 20% of spaces 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.
- 6.256. On balance, in light of the Site's PTAL 1-2 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 at Avondale Drive Estate as a result of

improved accessibility to public transport and sustainable travel modes. This includes a Travel Plan for the site with measures to encourage active travel, the introduction of a car club at the site, which will lead to reduced car ownership/use, 20% active and 80% passive electric charging spaces within the podium car parks as well as secure and sheltered cycle parking. An Active Travel Zone Assessment has also been prepared as part of the Transport Assessment to identify defined pedestrian / cycling routes in demonstrating connectivity through and beyond the Site. 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

- 6.257. Consistent with the estate-wide car parking strategy, for the Detailed First Phase, no car parking is proposed on-site and Block A residents will benefit from existing car parking across the estate with a temporary access created from the east.
- 6.258. The provision of car parking to come forward within the Outline Area will be commensurate with the remaining capacity for the estate and on the basis of a ratio of 0.34 spaces per residential unit, estate-wide, which includes 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.

Cycle Parking

Illustrative Masterplan

- 6.259. On the basis of the Illustrative Masterplan and indicative unit mix for the Outline Area, a total of 440 no. long-stay spaces will be provided for future and returning residents as well as 7 no. short-stay spaces for visitors. This is in accordance with the requirements of LP Policy T5 derived on a unit type basis.
- 6.260. Table 16 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.

- 6.261. 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 perimeter of residential blocks. 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

- 6.262. For the Detailed First Phase, a total of 57 no. long-stay spaces will be provided for future and returning residents as well as 2 no. short-stay spaces for visitors. This is based on the fixed Unit Mix for the Detailed First Phase as set out at Table 18 and therefore wholly accords with the requirements of LP Policy T5.
- 6.263. The resident and visitor spaces will be provided within a secure store located on the ground floor of Block A, in the south western corner of the building. This storage will benefit from frontage onto Avondale Drive and the provision will comprise a mix of two-tier racks and Sheffield stands.
- 6.264. 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

- 6.265. The Proposed Development, on the basis of the Illustrative Masterplan, has been designed to incorporate on-street servicing along Avondale Drive and Abbotswood Way for general deliveries and refuse collection, with servicing for blocks A, B, C and D taking place from Avondale Drive and servicing for blocks G and H taking place from Abbotswood Way. This approach avoids the need for a formal loading bay.
- 6.266. Refuse Collection for Blocks E, and general servicing for other blocks within Phase 1B, can however take place from the new internal service road, although at a minimum width of 3.7m, it is acknowledged that stationary vehicles would block exit movements given the one-way arrangement.

- 6.267. Where on-street access to bin stores is required, the proposals will include drop-kerb provision to ensure level access between the store and the carriageway.
- 6.268. 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

- 6.269. The Phase 1A proposals include a dedicated communal bin store along the Avondale Drive frontage, located within 10m of the carriageway, which will be used by both ground floor and upper floor units. As such, on-street delivery and servicing is envisaged, with drop-kerb provision to be delivered to ensure bins can be dragged between the store and carriageway.
- 6.270. 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 confirm with the requirements of LP Policy T7 and LPP2 Policy DMT1.

Construction and Traffic

Illustrative Masterplan

- 6.271. An Outline Construction Logistics and Management Plan ('CLMP'), prepared by Markides Associates, has been prepared in support of the HPA, which seeks to minimise the impacts of construction on the surrounding highway network, to include the pedestrian and cycling environment. A detailed CLMP will be produced as detailed design progresses and will be secured through an appropriately worded 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 CLMP is considered to address the requirements of LP Policy T7 and TfL Construction Logistics Plan Guidance (2017).

Detailed First Phase

- 6.272. It is considered there is sufficient information within the Outline CLP to allow Phase 1A demolition and

construction works to commence without the need for an associated planning condition needing to be applied, with the Principal Contractor required to prepare a Method Statement and apply for relevant licenses.

Energy and Sustainability

- 6.273. 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 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).
- 6.274. 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.
- 6.275. 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.
- 6.276. 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.

- 6.277. LPP2 Policy DMEI2 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.
- 6.278. 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.
- 6.279. 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 set outs 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.
- 6.280. 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

- 6.281. 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 London Plan Policy SI 2.
- 6.282. The proposed preferred energy strategy for efficiency purposes comprises a hybrid solution using a number of Air Source Heat Pumps (ASHP's) which will be located within individual blocks and, in addition to Photovoltaic (PV) panels to supply renewable electricity to the development. A back-up electric heating system is also to be incorporated. On the basis of the Illustrative Masterplan, The proposals achieve a 100% reduction in regulated CO2 emissions and therefore demonstrates the potential for net carbon-zero to be achieved on-site without any off-site requirements.
- 6.283. This is achieved through the use of:
1. High levels of insulation, airtightness and mechanical ventilation with high efficiency / low SFP heat recovery mechanical ventilation.
 2. Separate, centralised heat pump systems for domestic hot water and space heating – each optimised to the operating temperatures of the system it serves.
 3. An extensive rooftop PV array (1.25KWp per dwelling).
 4. A commitment to ongoing CO2 monitoring (ie energy consumption) in use.
- 6.284. In giving regard to LPP2 Policy DMEI 3, it is recognised that there is a planned future District Heat Network (DHN) within 900 metres of the Site. From pre-application engagement with GLA Officers, it is understood that it is unlikely to be available 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. Is therefore considered the Proposed Development has been suitably future proofed to satisfy the requirements of LPP2 Policy DMEI 3.

- 6.285. On the basis of the above and the submitted Energy Statement and Sustainability Strategy, it is clear that the construction and operation of Proposed Development can be designed in order to optimise their 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.
- 6.286. 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.
- 6.287. 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

- 6.288. The submitted Energy Statement and Sustainability Strategy, provides specific details on the proposed measures and commitments that will come forward as part of the Detailed First Phase. 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.

- 6.289. In summary, the proposed sustainability and energy saving measures which have been designed into Block A achieve a 101% reduction in Regulated CO2 emissions compared to Building Regulations (ie “Zero Carbon”) entirely through on-site measures; with no carbon offset component is proposed.
- 6.290. This is achieved through the use of high levels of insulation, airtightness and mechanical ventilation with high efficiency / low SFP heat recovery and mechanical ventilation, as well as separate, centralised heat pump systems for domestic hot water and space heating – each optimised to the operating temperatures of the system it serves. In addition, an extensive rooftop PV array provides 1.25KWp of sustainable energy per dwelling. This will complement the centralised heat pump system and result in a further reduction of 29% against Building Regulations.
- 6.291. 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 101% 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. 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.
- 6.292. In addition and in accordance with LP Policy SI 2, a Whole Life-Cycle Carbon Assessment has been undertaken and a Circular Economy Statement has been prepared, and both submitted as part of this HPA to demonstrate the embodied carbon usage of each stage of the Proposed Development over its lifetime. This confirms that the assessed buildings as designed are well adapted to deal with overheating in the near future when compared with current data and near future data. There are very high levels of operable windows and blinds which enable occupants to adapt the building in order to achieve thermal comfort. The design of the glazing and the overhangs in the façades has helped to minimise the amount of solar gain

getting in through the building fabric. Internal gains from waste heat will be minimised. Blinds should be included in the base build specification.

- 6.293. 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 for Block A, it confirms that the block has been well designed to adapt and deal with overheating in the near future when compared with current data and near future data. Block A provides 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 Detailed First Phase of the Proposed Development is therefore considered to provide a good standard of internal residential amenity.

Flood Risk and Drainage

- 6.294. 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.
- 6.295. 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..."*. 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”*.

- 6.296. 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 London Plan but as carried forward under LP Policy SI 13. In line with this, it 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.
- 6.297. With reference to the Environment Agency’s (“EA”) 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.
- 6.298. A Flood Risk Assessment and Drainage Strategy has 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 is 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.
- 6.299. The Proposed Development 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.

- 6.300. As a result of the combined measures, the Proposed Development will significantly reduce run-off and 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 4.3 l/s which will provide a betterment when compared to the existing drainage position.
- 6.301. 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.
- 6.302. On the basis of the above, and 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 DMEI9 and DMEI10. 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

- 6.303. In seeking to conserve and enhance the natural environment, NPPF 186 expects planning policies and decision 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.”

- 6.304. 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. . Air Quality Assessments are required to be submitted as part of planning applications for major development proposals to demonstrate compliance with this policy.
- 6.305. At a local level, LPP2 Policy DME14 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.
- 6.306. The Site is located within an Air Quality Management Area but not a designated 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 Reserved Matters Application to ensure continued compliance with planning policies cited above.
- 6.307. 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 Construction Logistics Plan.

- 6.308. 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” and, therefore, future residents will experience acceptable air quality and the Site is considered to be suitable for its continued end-use as 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. .
- 6.309. 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 is worse than “air quality neutral” in terms of “transport emissions” and therefore there is a potential for additional mitigation to be required in order to reduce and/or offset the operational transport emissions. In this context, the Proposed Development is supported by: a submitted Travel Plan (appended to the submitted TA) for the Site with measures to encourage active travel; an introduction of a car club at the Site, which will lead to reduced car ownership/use; the provision of 20% active and 80% passive electric charging spaces within the podium car parks; and, the proposals will have secure and sheltered cycle parking. These transport mitigations aiming at reducing transport emissions overall are important contributors in off-setting impact against “air quality neutral” benchmarks. It should also be noted that the Proposed Development demonstrates it being substantially better than “air quality neutral” in terms of “building emissions” (on-site building emissions will be zero), and this will, to some degree, offset the extent to which the Proposals are worse than “air quality neutral” in terms of “transport emissions”.
- 6.310. 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. Various transport mitigations as set out above can address performance against “air quality neutral” which are evident within the HPA and more specifically within the submitted TA and submitted Travel Plan. The Proposals are therefore considered to satisfy the requirements of NPPF 186, LP Policy SI 1 and LPP2 Policy DMEI14.

Noise

- 6.311. 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”*.
- 6.312. 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. 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.
- 6.313. 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 development to mitigate the potential for adverse effects where they cannot be separated from noise sources without undue impact on other sustainable development objectives.
- 6.314. 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.
- 6.315. 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 Reserved Matters Applications.

- 6.316. 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 Avondale Drive at the southern boundary 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 Avondale Drive 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 detailed design and building specification of Block A within the Detailed First Phase (as discussed further below).

Illustrative Masterplan

- 6.317. 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.
- 6.318. 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 result in only a very marginal increase vehicular movements to and from the Site and 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.
- 6.319. 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. Nonetheless, the private balconies and gardens in close proximity to the A312 will exceed the upper guideline value of 55dB LAeq. As such, to reduce external sound levels in these areas by as much as possible, a balustrade to balconies is to be implemented which will reduce noise levels by approximately 5dB and therefore within acceptable sound levels as defined in BS8233:2014.

6.320. 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.

6.321. 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

6.322. 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.

6.323. In terms of the internal living environments of the residential units, the assessment confirms that with commensurate mitigation (in relation to glazing specification and 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.

- 6.324. Private balconies and gardens in close proximity to Avondale Drive will exceed the upper guideline value for such external amenity areas. The balconies proposed on the elevation of Block A fronting Avondale Drive will include mitigation in the form of balustrades, which will reduce noise levels by approximately 5dB. With this in place it is considered that the external sound levels at private balconies will meet the relevant guideline value. For the communal (private) amenity area located centrally adjacent to Block A, overall the external sound levels are expected to meet the upper guideline value.
- 6.325. Given, the urban setting of the Site and location of Block A next 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.
- 6.326. 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. Block A has been designed to mitigate integrates 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

- 6.327. 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.
- 6.328. 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.

6.329. There are a limited number of exemptions set out under the Planning Gateway One guidance which includes applications seeking outline planning permission. This Hybrid Planning Application contains part Outline, part Detailed. For the Detailed First Phase, there are no “relevant buildings” as defined as 7 or more storeys in height (or 18+ metres) proposed.

6.330. Although the Phase 1A building is below the 18m threshold, it is important to note that the following elements will be provided regarding fire safety:

- The building will operate a stay-put policy. The building will be designed in accordance with Approved Document B.
- The upper levels will be provided with a mechanical smoke venting system, with the 0.6m² smoke shaft at the dead-end of the corridor which exceeds 7.5m. This system will also serve the apartment corridor at ground floor level.
- All apartments will be provided with sprinkler protection in accordance with BS9251:2021. The structural fire resistance for the building will be 60 minutes.
- A dry riser will be provided in the staircase, and all points of the floorplate will be within 45m of the dry riser outlet.

6.331. 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 Reserved Matters Application to ensure all buildings achieve the highest standards of fire safety in compliance with the criteria set out under this policy.

6.332. 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 future requirements in relation to the Detailed and Outline Areas. This provides details on the design and materiality of the indicative blocks and how they have been configured in accordance with Building Regulations. This confirms that the buildings and their indicative layouts within the Outline Area, 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.

Planning Statement

Avondale Drive Estate Regeneration



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 S106 Heads of Terms (“HoTs”) are likely to include the following, subject to further consultation with LBH LPA Officers during determination:

- Affordable Housing – to secure provision proposed on-site as part of the Proposed Development;
- Public Realm – to secure the improvements proposed on-site as part of the Proposed Development, as required and justified;
- Children Play Space – to secure a financial contribution and management scheme for the proposed off-site play at the adjacent Park;
- Employment Training Initiatives – to secure an employment strategy or financial contribution to positively contribute to specific identified local employment issues;

- Construction Training – to secure financial contributions and secure 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.

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 DMCI7 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 (indexed linked) 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 (indexed linked) 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 Avondale Drive 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 ; new pedestrian and vehicular accesses; 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 Block A comprising 30 residential units (Class C3); new pedestrian access; associated amenity space and landscaping; cycle parking, refuse storage, and other associated infrastructure.”

8.3. The Site currently comprises the Avondale Drive Estate. The estate consists of three 13-storey blocks of flats, each containing 48 flats (total 144 homes). The existing estate was built in the 1970's 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 Local Planning Authority, the GLA, Transport For London, and other key stakeholders including the local community.

8.4. This Hybrid Planning Application is being submitted as a hybrid proposal which seeks permission for development of 240 units overall. It comprises elements in detail (“the Detailed First Phase”) and in outline (“the Outline Area”). The detailed element comprises 30 units and the outline component (appearance, landscaping, layout and scale, and access reserved) for the development of 210 units including car and cycle parking and open space. These elements are defined on Parameter Plan 1, 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 240 residential units, including the re-provision of 117 social rent affordable units and 123 new private homes. The Proposed Development will also provide

extensive new open space that forms an integral part of the redevelopment proposals including the provision of 1,201 square metres of public open space, public realm and landscaping, 1,324 square metres of communal (private) amenity space across podium gardens and ground floor courtyards, as well as 2,623 square meters of private amenity space.

- 8.6. The Hybrid Planning Application 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. 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 Avondale Drive Estate has been carefully considered in accordance with Hillingdon's Local Planning Policies and the London Plan (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 quality and connections through the existing estate is also poor representing poor quality design and place making. 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:
- Optimisation of an existing residential estate which is highly accessible, located in close proximity to Hayes Town Centre and within the Hayes 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

new and enhanced public open space and improved pedestrian and cycle routes.

- Demolition of the existing low quality estate and redevelopment to provide new high quality affordable housing (52.5% 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.
- The Proposed Development will include a meaningful provision of market housing (123 units) to subsidise the aspirations of estate renewal with a total of 240 new homes constructed across the estate that are sustainable and 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, and mixed and balanced community.
- 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 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.
- 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 contain 68% dual aspect units with 100% of family sized units (3 and 4 bedroom) achieving dual aspect.
- Car parking is proposed at a level compliant with London Plan 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.
- The Proposed Development has been designed to achieve an overall reduction of 100% in carbon dioxide emissions through on-site interventions.
- 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.

- The permission would also be subject to Unilateral Undertaking which will secure the provision of affordable housing, public realm improvements and a range of other contributions where CIL R122 compliant.

8.10. Notwithstanding the above, an Economic Impact Assessment (incorporating a Social Value measurement) 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:

- 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.
- 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.
- 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.
- 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 will help meet a diverse population's needs and resolve issues such as overcrowding in Avondale Drive Estate.
- 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.

- The Proposed Development will help unlock further renewal of the wider area, improving employment prospects and revitalising the local economy.
- The Proposed Development will increase employment opportunities, as follows:
 - a. 60 FTE gross construction jobs per annum, generating around 300 construction jobs over the duration of the demolition and construction process;
 - b. 15 FTE off-site construction jobs;
 - c. 70 FTE on and off-site operational jobs, to include an uplift of around 30 on and off-site jobs of which 10 will be on-site; and
 - d. 5 FTE additional jobs generated within the borough in the retail, food and beverage sectors.
- The Proposed Development is likely to support £1.48m net additional Gross Value Added per annum benefitting the local economy.
- The Proposed Development is likely to generate estimated council tax revenue of £104k per annum based on the net uplift in residential units.
- The proposed uplift in residential units is also expected to generate a total new household expenditure of around £1.14m per annum, of which around £0.84m will be retained within the borough.
- 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 public open space, communal (private) amenity space and private amenity space, and improved connectivity to existing facilities and public transport.

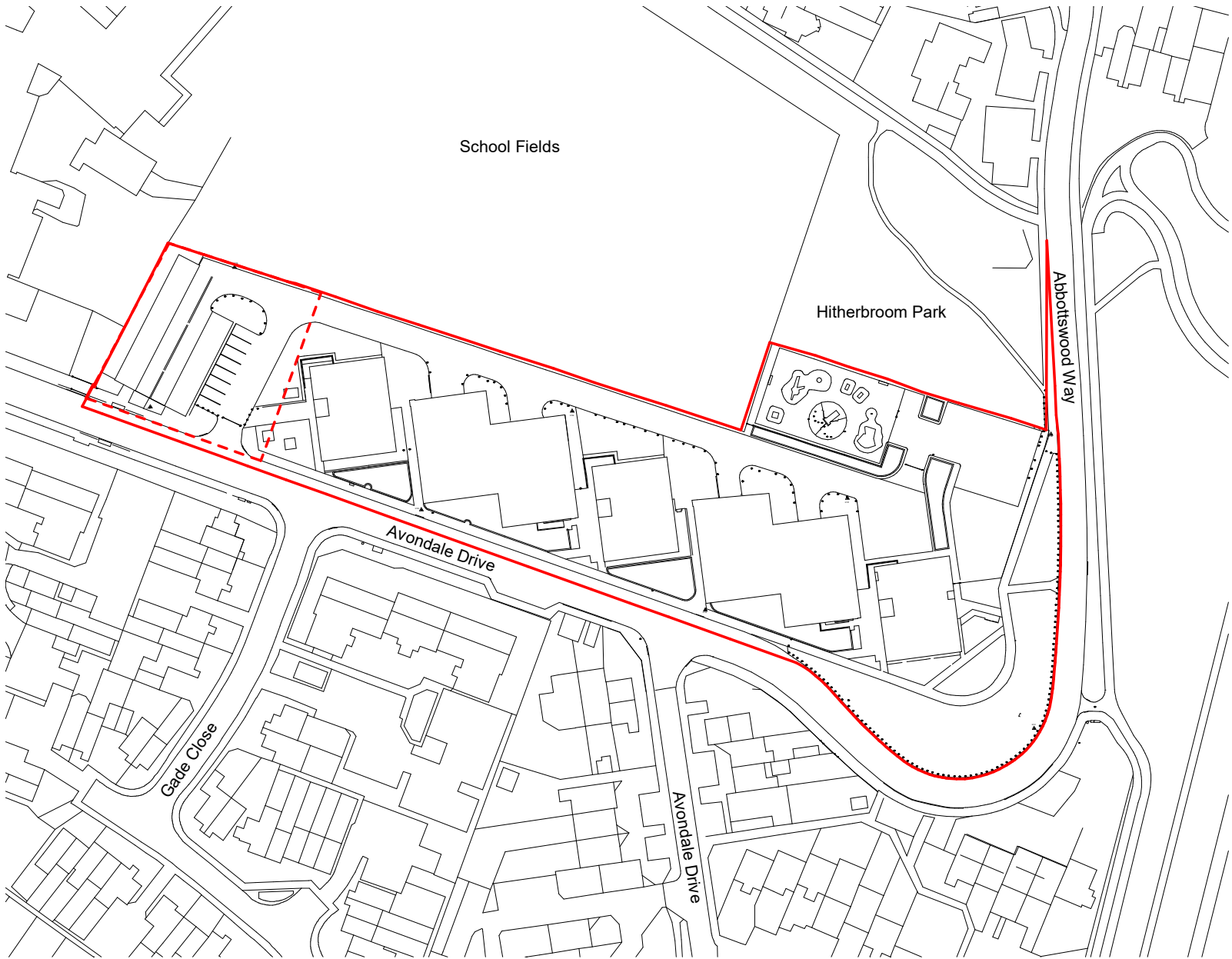
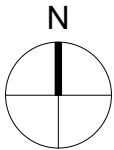
8.11. The Planning Statement has assessed the material considerations arising from the Proposed Development against the prevailing planning policy framework and has demonstrated that it complies with the relevant national, London Plan and local planning policy guidance. It is therefore respectfully requested that the proposals are recommended for approval.

Appendix 1

Red Line Site Location Plan

GENERAL NOTES
This drawing is © 2019 PTE architects.
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 Boundary for Hybrid Planning Application
- Phase 1A Definition Red Line as part of Hybrid Planning Application

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Site Location Plan	AVD- 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.

Avondale Drive Estate

Key Topics of Discussion	Officer Feedback Received	Applicant Design Response
Pre-app 1 LBH: 16/06/2021 GLA: 04/07/2021		
Unit Layouts for Blocks G-H	- LBH Officers raised concern that some of the proposed courtyard balconies are located directly opposite facing units. - Separation distances are also less than 11m in places. As such, there is potential for overlooking between these units which should be assessed further. - Requests also made for indicative internal layouts to help justify position.	- Further illustrative design details provided on the unit layouts in relation to far eastern blocks (G-H). - This included elevational design principles for blocks G-H which incorporates material treatment, fenestration and the balcony strategy. - In addition, details regarding the public realm and landscaping for the ground floor amenity space are being developed by TEP (the appointed landscape consultant). - Review of separation distances and outlooks across internal courtyards within the proposed blocks in the interest of future residential amenity. - Indicative sections provided to show the relationship between external amenity space and units within perimeter blocks.

10 Storey Overshadowing	- GLA Design Officers queried whether the 10 storey block was located in the correct location, positioned on new street connecting to the park. Suggested it may be best to relocate in the south-east to create landmark at the end of Avondale Drive. - Requested further site analysis on how the 10 storey in its current location overshadows the park to the rear.	- Preliminary daylight and sunlight review conducted to assess concerns raised regarding overshadowing of 10 storey block on adjacent park. - Confirmed that whilst there will be a degree of shadow cast across the park from the 7 & 10-storey courtyard building to the east of the site, sunlight will be available either side of this proposed block such that we would expect the Hitherbroom Park to receive ample levels of sunlight throughout the course of the year.
Internal Daylight Assessments	LBH Officers requested further information for sunlight and daylight testing to assess the design in more detail, mindful that internal courtyard units, some which have balconies above windows, may perform poorly.	Initial daylight and sunlight results on internal facades across the blocks. Identified that the majority of elevations will achieve high levels of sky visibility at or above the 27% VSC target and subject to further more detailed modelling work in stress-testing the working, outline designs.
Pre-app 2 LBH: 27/07/2021 GLA: 01/09/2021		
Blocks E – H Separation Distances and Internal Layouts	- LBH Officers commented that the two bed units within the courtyard have poor outlook. As the side facing windows of these units are obscured, this could be considered as being single aspect dwelling. - Linear north-south units would be preferred. Recommended widening the gaps between building blocks to increase physical separation and indicative flat layout to be reconsidered, particularly in relation to Blocks E, F,G and H (in terms of outlook).	- The separation distance between the proposed blocks within the eastern part of the site (Blocks E, F, G, and H) have been increased. - Indicative flat layouts for these eastern blocks was reviewed and amended to improve privacy and outlook.

Block G – H Heights	LBH Officers recommended additional storey height could alleviate for loss of units. This would not be appropriate on the 10 storey building but would be at the currently proposed 7 storeys to achieve potentially new heights of 8 storeys fronting Abbotswood Way.	Blocks G and H have increased height to 8 storeys.
D/S Performance of Podium gardens	GLA Design Officers queried whether there was the potential for the podium gardens to be increased in depth or opening width. Requested that the different design options are provided to demonstrate which options deliver the best daylight/sunlight performance and least overshadowing into the communal amenity space and adjacent Hitherbroom Park. Further consideration is also required regarding the communal open space and park and the impacts on these spaces for daylight and sunlight access under the current design.	- Further sunlight and daylight analysis conducted across the scheme and now existing residential properties close to the site with also an overshadowing assessment conducted on the proposed podium gardens and the adjacent park demonstrating improvements. - The results of these assessments show that the shared public space at ground level meet the BRE target levels with all of the space receiving at least 2 hours of sunlight. The sunlight exposure illustrates that the vast majority of the main courtyard spaces would either meet the targets or just short of the 2-hour target at between c.1.8-2 hours such that these deviations are considered insignificant, based on pre application designs as presented.
Play Space Provision	- GLA Design Officers highlighted that the scheme falls slightly short on doorstep play space provision by c. 49m. Requested more details regarding how this provision has been calculated, noting the tendency for quantum's to reduce once further details are added to the scheme. - Noted the need to identify exact shortfall in order to scope the necessary off-site provision at	- The play space strategy was developed further to include on-site door step play (podiums and private gardens included) together with older children play potentially off-site at the adjacent Hitherbroom Park which would be within very close, walkable distance for new and existing residents. - The play strategy for the scheme is based on providing doorstep play for under 5's within the resident

	Hitherboom Park. Also noted the preference for older age play space to be located off-site in the park instead of on the roofs of the proposed blocks. GLA Officers also noted that the access road to the linear park is dominated by car parking. Queried whether the playspace located next to car parking on Avondale drive is for older children. Officers said that locating the play space next to a busy road was a concern and that it may be more appropriate to locate play space in the park behind instead.	communal podium garden areas (to include private garden space), with 'local playable space' for use by older children, primarily within neighbouring Hitherboom Park which is in very close walkable distance to the estate.
Pre-app 3 LBH: 27/09/2021 GLA: 04/10/2021		
Daylight and sunlight Testing	LBH Officers recommended that the wider public realm is included on the overshadowing assessments as part of the external amenity space which is available for communal and public use and therefore should be considered as part of the demonstrating a good quality offer overall.	Comprehensive daylight, sunlight and overshadowing assessments undertaken as part of full application submission, which identifies adequate light access to proposed units and immaterial impact on existing properties surrounding the site in accordance with BRE guidelines. These assessments also model overshadowing potential and conclude that based on pre application design changes, the ground and podium level amenity spaces provide high quality space adequately sunlit in accordance with BRE guidelines.
Energy Strategy	LBH Officers agreed with applicant that a separate meeting with LBH's Climate Change Officer will be arranged to seek agreement on the proposed energy and sustainability strategy.	- Meeting with LBH Climate Change Officers took place on Tuesday 5th October 2021 in which the energy strategy was agreed with LBH Officers and subsequently with GLA Officers. - This comprises a hybrid solution using a number of Air Source Heat Pumps (ASHP's) which will be located within individual blocks and, in addition to Photovoltaic

		(PV) panels to supply renewable electricity to the development. A back-up electric heating system is also to be incorporated.
Design Fix Sign-off	LBH Officers agreed that the design team and LBH would arrange a separate session to seek sign off on the parameters plans, detailed first phase drawings and illustrative material ahead of design fix.	Meeting took place on Tuesday 12th October 2021 to run through the documents and drawings with LBH Officers in person and sign off prior to the project Design Fix on Friday 15 October 2021.
Quality of Podium and ground floor amenity areas at eastern blocks	GLA Officers raised concerns at the closing up of the courtyards. Queried whether further massing could be transferred to other blocks as an alternative.	Comprehensive daylight, sunlight and overshadowing assessments undertaken as part of full application submission, which identifies adequate light access to proposed units and immaterial impact on existing properties surrounding the site in accordance with BRE guidelines. These assessments also model overshadowing potential and conclude that based on pre application design changes, the ground and podium level amenity spaces provide high quality space adequately sunlit in accordance with BRE guidelines.
Boundary Treatment with School	GLA Officers requested further detail on treatment of interface between the school.	- A key focus of the landscape strategy is the enhancement of the boundary treatment with the school. This consists of a fence and mature tree planting forms an integral part the site's wider landscaping strategy in support of the current application. The western boundary tree cover adjacent to Minet Junior School will be retained and properly protected. - Here, trees would be crown-lifted and slightly reduced to allow the buildings to be constructed, then a new shade tolerant hedgerow planted beneath as part of the landscaping scheme to provide reinforcement visual screening between the two sites.

Dual Aspect Dwellings	GLA Officers raised concerns around the number of dual aspect units seeking clarity on the overall percentage across the Indicative Masterplan.	- The scheme sought to optimise the provision of dual /double aspect dwellings. - The Indicative Masterplan achieves 68% of dual/ double aspect overall.
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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 demolition, and operational phases, future residential expenditure, 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 and quantifying the benefits of urban greening. 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 will 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 5 years.

Table 1.1: Indicative Construction and Delivery Programme

Proposed Development Phase		Start date	Finish date
Construction of Phase 1a (Block A)		Autumn 2022	Summer 2024
Outline Area	Phase 1b (Blocks E - H)	Spring 2023	Spring 2025
	Phase 2 (Blocks B, C and D)	Spring 2025	Summer 2027

Source: Savills, 2021.

- 1.3.2. We estimate that the construction phase will generate around 300 construction job years over the duration of the construction process. This equates to an average of around 60 FTE gross construction jobs per annum (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 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).

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.

³ CITB Construction Skills Network 2021-2025

⁴ ONS, Input Output Analytical Tables, 2017

- 1.3.4. **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 proposed scheme is expected to generate around 45 total net construction jobs for residents of LBH.

Table 1.2: Estimated Construction Phase Jobs

	Proposed Scheme
Gross Direct Construction Jobs per annum	60
<i>Leakage (53%)</i>	30
Onsite Jobs (for residents of LBH)	30
<i>Displacement (25%)</i>	10
<i>Multiplier (2.03)</i>	20
Offsite Construction Jobs	15
Net Direct and Indirect Construction Jobs per Annum (rounded)	45

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

1.4. Operational Jobs

- 1.4.1. Operational jobs will be created through homeworking. 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 30 existing homeworkers full-time equivalent ('FTE'). The proposed development is estimated to accommodate around 40 FTE homeworkers meaning there is anticipated to be a net uplift of 10 FTE homeworkers generated by the proposed development.
- 1.4.2. We include an estimate of the overall operational local employment impact after taking into account multiplier effects (1.59 multiplier effect⁶). **Table 1.3** summarise the estimated operational jobs created onsite.
- 1.4.3. The proposal is estimated to generate a total of 40 gross on-site jobs. Once multiplier effects have been taken into account, the proposed scheme is estimated to generate 70 on and off-site jobs. This represents a net uplift of around 30 on and off-site jobs of which 10 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)	40	30	40
<i>Multiplier (Residential 1.59)</i>	30	10	20
Total Jobs (Direct & Indirect)	70	40	30

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

- 1.4.4. 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 (96).
- 1.4.5. 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.

⁵ ONS Characteristics of Home Workers (2014)

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

- 1.4.6. 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 96 residential units is expected to generate a total new household expenditure of around £1.14m per annum of which around £0.84m 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 higher.
- 1.4.7. **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 5 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	£0.62m
Retail jobs generated in LBH	1
New food and beverage expenditure introduced per annum in LBH	£2.14m
Food and beverage jobs generated in LBH	4
Net direct and indirect operational jobs induced by new residential expenditure in LBH	5

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

1.5. Gross Value Added

- 1.5.1. Gross Value Added ('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 £1.48m 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)	£4.16m	£2.68m	£1.48m

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 band C. 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 £33k 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 £137k per annum, disregarding any discounts that may be applicable. This represents a potential net uplift in council tax revenues of around £104k per annum.

1.8. Section 106 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 allowed for which have been worked up in collaboration with the Council. The exact S106 / S278 financial contributions will be discussed in detail with LBH 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 locality.

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 around £640,000.

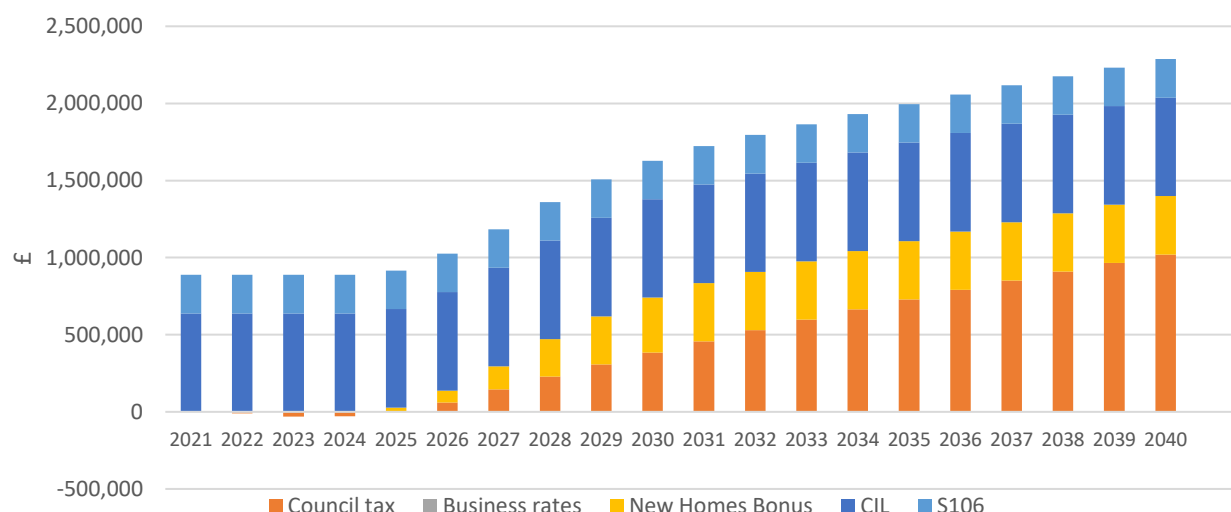
1.10. New Homes Bonus

- 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 around £480,000.
- 1.10.2. 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 £2.0m (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 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 122 weeks of apprenticeships over 5 years of construction will provide opportunities for 3 apprentices. With a value of £255 per person per week, this will contribute to a total social value of around £31,000 over the construction phase. The construction will also provide work experience 20 people, which at £192 per person will yield a social value of £3,800. Finally the provision of 9 school visits or careers events supported by the scheme would have a social value of £45,000.

Table 2.1 Social Value of Skills and Training Provision during Construction

	Apprenticeships	Work experience	Workshops/School visits
Quantity	3 people	20 people	9 events
Duration	122	-	-
Value	£255 pp/week	£192 pp	£5,000 per event
Social Value p.a.	£31,000	£3,800	£45,000

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 60 temporary on-site jobs during construction. Beyond the benefit of providing jobs, this is estimated to provide additional social 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 impact of around £8,000 per year during the construction period.

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

- 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 £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 £21,600 in total.

Table 2.2 Unemployment Reduction Health Benefits From Construction Jobs

	Measure
Number of jobs per year	60
Number previous unemployed (10%)	6
Value per job due to NHS savings	£2,410
Social value per annum	£14,500
Number previously from disadvantaged group (3%)	1
Value per job due	£21,600
Social value per annum	£21,600

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 £6.2m.

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 enhancement of public realm.
- 2.3.2. The social value impact from the creation of high quality and well-lit new public realm and green space is estimated using the findings from the Fields in Trusts¹⁰. 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, estimated social value generated by the proposed development's opens spaces is £2,000 per annum.

¹⁰ Fields in Trusts, 2018. Revaluing Parks and Green Spaces.

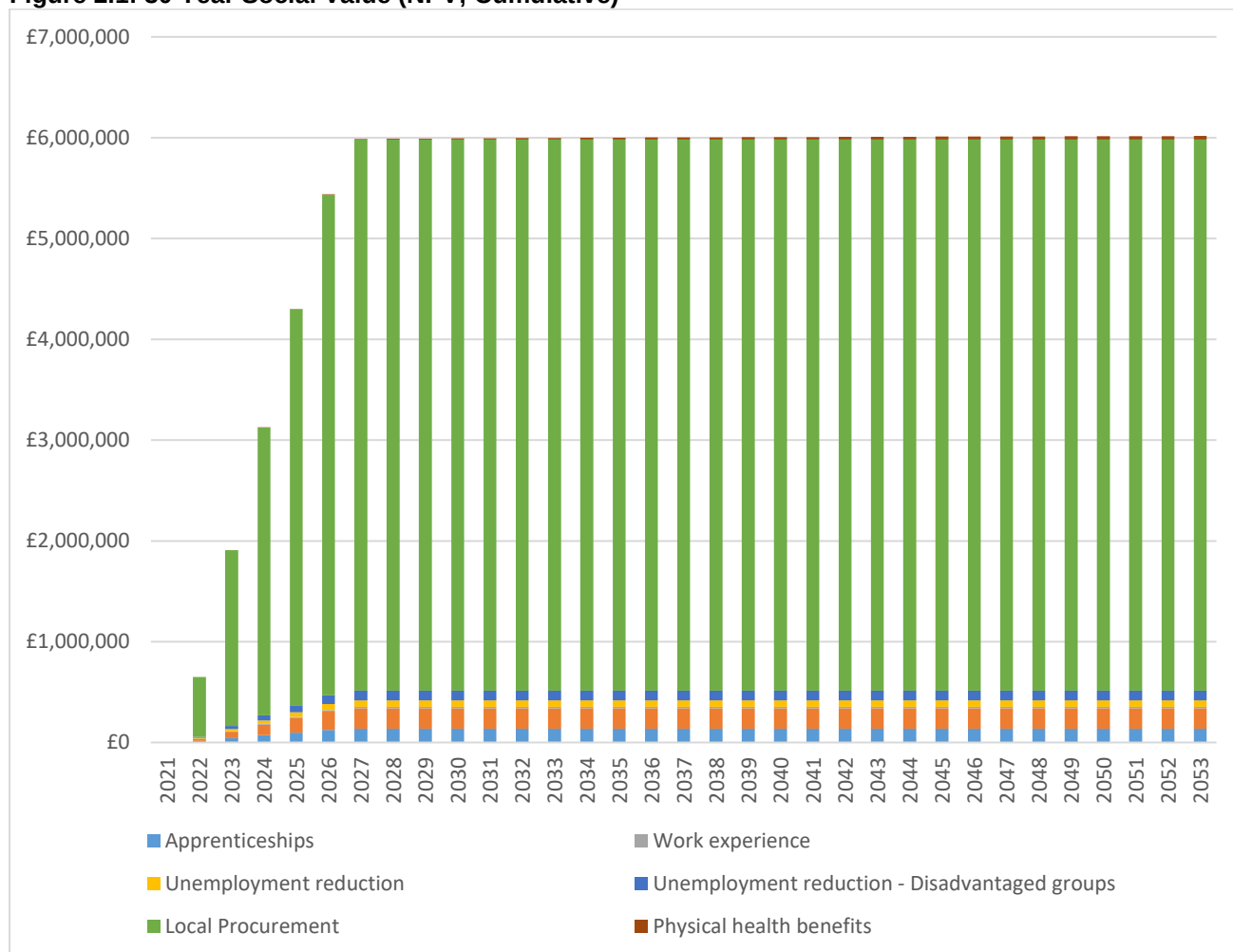
<https://www.fieldsintrust.org/Upload/file/research/Revaluing-Parks-and-Green-Spaces-Summary.pdf>

2.4. Cumulative Social Value Impact: £6.0m 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, it is possible to 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 £6.0m 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 through reducing unemployment, health benefits, 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	60
On-Site Operational Jobs	40
Net Additional Operational Jobs (on-site and off-site)	30
Residential Expenditure (retained in LBH)	£840k
Additional Gross Value Added (GVA) per annum	£1.48m
Council Tax Revenue Uplift per annum	£104k
S106 / S278 Agreements	£250k*
New Homes Bonus	£480k**
Community Infrastructure Levy	£640k
20 Year Cumulative & Discounted Income (NPV at 3.5%)	£2.3m

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	£31,000	£138,000
Workshops / school visits	£45,000	£200,000
Work experience	£4,000	£17,000
Unemployment reduction – NHS Savings	£14,000	£64,000
Unemployment reduction – Disadvantaged Groups	£22,000	£96,000
Local Procurement	£1,232,000	£5,467,000
Operation		
New Public Realm Benefit	£2,000	£36,000
Total	£1,350,000	£6,000,000

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.