



PROGRESS PLANNING

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## Pre Application Planning, Transport, Design and Access Statement

Nos. 14-18 Pield Heath Road & No. 2 Pield Heath Avenue, Hillingdon, UB8 3NF

Consolidation and redevelopment to provide a Nursing Home (60 rooms) comprising a two storey detached building with accommodation at roof and basement levels following demolition of existing Bed and Breakfast Hotel and 3 dwellings with associated access and landscaping works

Prepared by Progress Planning

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## Table of Contents

<b>EXECUTIVE SUMMARY</b>	<b>2</b>
<b>THE SITE</b>	<b>3</b>
<b>PROPOSED DEVELOPMENT</b>	<b>3</b>
<b>PLANNING HISTORY</b>	<b>3</b>
<b>PLANNING POLICY</b>	<b>4</b>
<b>PRINCIPLE OF DEVELOPMENT</b>	<b>17</b>
<b>IMPACT ON THE CHARACTER OF THE AREA</b>	<b>20</b>
<b>LIVING CONDITIONS FOR FUTURE OCCUPIERS</b>	<b>21</b>
<b>TRANSPORT</b>	<b>22</b>
<b>TREE, LANDSCAPING &amp; URBAN GREEN FACTOR</b>	<b>23</b>
<b>NOISE</b>	<b>24</b>
<b>SUSTAINABILITY</b>	<b>24</b>
<b>AIR QUALITY</b>	<b>25</b>
<b>FLOOD RISK / DRAINAGE</b>	<b>25</b>
<b>OTHER MATTERS</b>	<b>26</b>
<b>CONCLUSION</b>	<b>26</b>



## **Executive Summary**

This statement has been submitted in support of this application for consolidation and redevelopment of the site to provide a Nursing Home (60 rooms) comprising a two storey detached building with accommodation at roof and basement levels following demolition of existing Bed and Breakfast Hotel and 3 dwellings with associated access and landscaping works.

This application follows a formal pre-application proposal for a part 4, part 3 and part 2 storey detached Nursing Home containing 72 rooms. The Council's feedback was broadly very positive and welcoming of the development, however some of the comments has led to the development being scaled back in size with more soft landscaping provision and better servicing arrangements.

This statement sets out how the development would meet local, regional and national planning policies. See the main body of the report below for consideration of these relevant matters.

There is Local and London Plan support for making more efficient use of sustainable, underutilised brownfield sites for the delivery of care home accommodation. The institutional population for Hillingdon is projected to increase to around 7,600 persons over the period 2014-36 and although many older people are living healthier longer independent lives, there is still a identified need for institutional establishments such as the development hereby proposed. Therefore, the principle of delivering high quality residential care accommodation is considered acceptable, subject to meeting the other requirements of policy DMH8 of the Local Plan.

The site is located within close proximity of Hillingdon Hospital, but despite this, the area is generally characterised by residential properties and as such the proposal would not lead to an over concentration of similar uses detrimental to residential character or amenity of the area.

In terms of the design approach, the pre-application advice from the Council has been followed and the scheme reduced from 72 to 60 rooms and from 4 storeys to 2 and half storeys. The Council was welcoming of this design, including in terms of scale and bulk and the proposal was considered to be in keeping with the character of the area whilst optimising the use of the site in accordance with adopted policy.

The proposal would provide a proportionate level of car parking for this sustainable location and 8 cycle parking spaces in accordance with policy to encourage alternative green modes of transport.

Overall, the approach to this development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the London Plan as well as the aims and objectives of Council's Local Plan.

## **The Site**

The site comprises 4 separate parcels of land which is located on the northern side of Pield Heath Road, at the corner of its junction with Pield Heath Avenue, in Hillingdon. The sites currently comprise a Bed and Breakfast Hotel establishment and 3 detached dwellings. These addresses are Nos. 14-18 Pield Heath Road & 2 Pield Heath Avenue.

None of the properties are listed, nor are they located within a conservation area. The area is generally residential in character apart from the hotel on the application site which is situated on the corner. Hillingdon Hospital is also located approximately 500m to the west along Pield Heath Road.

The site is undesignated in the Hillingdon Local Plan. It has a PTAL rating of 3 and is located in Flood Zone 1.

## **Proposed development**

This application seeks planning permission for consolidation and redevelopment to provide a Nursing Home (60 rooms) comprising a two storey detached building with accommodation at roof and basement levels following demolition of existing Bed and Breakfast Hotel and 3 dwellings with associated access and landscaping works.

This application follows a formal pre-application proposal for a part 4, part 3 and part 2 storey detached Nursing Home containing 72 rooms. The Council's feedback was broadly very positive and welcoming of the development, however some of the comments has led to the development being scaled back in size with more soft landscaping provision and better servicing arrangements.

This statement sets out how the development would meet local, regional and national planning policies. See the main body of the report below for consideration of these relevant matters.

## **Planning History**

There has been a number of planning applications consented on the site relating to domestic extensions and there is also the change of use of dwellinghouse to guest house / hotel that was approved for 18 Pield Heath Road under application ref: 9287/APP/2001/751. There are no other relevant planning applications relating to the site or this proposal.

As mentioned above, formal pre-application advice was sought in advance of this planning application for consolidation and redevelopment of this site to provide a 72 room nursing home comprising a part 4 storey, part 3 storey and part 2 storey building following demolition of the existing Bed and Breakfast Hotel and 3 dwellinghouses.

Hillingdon Council's feedback was generally supportive of the redevelopment, however the comments received has led to changes to the scheme and a reduction in scale to 60 rooms. Following the advice of the Council, improvements to the servicing and landscape arrangements have also been provided. As well as general design improvements to the appearance of the building. It is now anticipated that the Council will lend their full support to the revised scheme.



## **Planning Policy**

The proposed development would be assessed against the Development Plan Policies contained within Hillingdon's Local Plan: Part 1 & 2, the London Plan, the NPPF and supplementary planning guidance by both the London Borough of Hillingdon and GLA.

## National Policy

### National Planning Policy Framework

The National Planning Policy Framework (NPPF) under paragraph 11 states decisions should apply a presumption in favour of sustainable development and 11(c) stipulates that for decision taking this means approving development proposals that accord with an up to date development plan without delay.

Paragraph 38 stipulates that local planning authorities should approach decisions on proposed development in a positive and creative way. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Chapter 11 of the NPPF refers to 'Making effective use of land'. Paragraph 117 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

Paragraph 122 states that planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) Local market conditions and viability;
- c) The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) The desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) The importance of securing well designed, attractive and healthy places.

Chapter 12 of the NPPF refers to 'Achieving well-designed places'. Paragraph 124 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspects of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

Paragraph 127 states 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.

Paragraph 131 states that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

## Regional Policy

### London Plan

#### GG2 Making the best use of land

To create successful sustainable mixed use places that make the best use of land, those involved in planning and development must:

- A. Enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites
- B. Prioritise sites which are well connected by existing or planned public transport
- C. Proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling
- D. Applying a design led approach to determine the optimum development capacity of sites
- E. Understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character
- F. Protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible

- G. Plan for good local walking, cycling and public transport connections to support a strategic target of 80% of all journeys using sustainable travel, enabling car free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth
- H. Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance

### D3 Optimising site capacity through the design led approach

#### The design led approach

- A. All development must make the best use of land following a design led approach that optimises the capacity of the sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.
- B. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.
- C. In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2 Small sites.
- D. Development proposals should:

#### Form and Layout

- 1) Enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions
- 2) Encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area
- 3) Be street-based with clearly defined public and private environments
- 4) Facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

#### Experience

- 5) Achieve safe, secure and inclusive environments

- 6) Provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest
- 7) Deliver appropriate outlook, privacy and amenity
- 8) Provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
- 9) Help prevent or mitigate the impacts of noise and poor air quality
- 10) Achieve indoor and outdoor environments that are comfortable and inviting for people to use

#### Quality and character

- 11) Respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character
  - 12) Be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
  - 13) Aim for high sustainability standards (with reference to the policies within London Plan (Chapters 8 and 9) and take into account the principles of the circular economy.
  - 14) Provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.
- E. Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.

#### Policy D4 Delivering good design

##### Design analysis and development certainty

- A. Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and pace making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design led approach.
- B. Where appropriate, visual, environmental and move modelling assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.

##### Design scrutiny

- C. Design and access statement submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.
- D. The design of development proposals should be thoroughly scrutinised by borough planning, urban design, conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make



use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E, if they:

- 1) Include a residential component that exceeds 350 units per hectare;  
or
  - 2) Propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building.
- E. The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:
- 1) Design reviews are carried out transparently by independent experts in relevant disciplines
  - 2) Design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme
  - 3) Where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews
  - 4) Design review recommendations are appropriately recorded and communicated to officers and decision makers
  - 5) Scheme show how they have considered and addressed the design review recommendations
  - 6) Planning decisions demonstrate how design review has been addressed.

#### Maintaining design quality

- F. The design quality of development should be retained through to completion by:
- 1) Ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development
  - 2) Ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design
  - 3) Avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter
  - 4) Local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.

#### Policy D5 Inclusive Design

B. Development proposal should achieve the highest standards of accessible and inclusive design. They should:

- 1) Be designed taking into account London's diverse population
- 2) Provide high quality people focused spaces that are designed to facilitate social interaction and inclusion
- 3) Be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment

4) Be able to be entered, used and exited safely, easily and with dignity for all

5) Be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building

C. Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement.

#### Policy D11 Safety, security and resilience to emergency

- A. The Mayor uses his convening power to work with relevant partners and stakeholders to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register.
- B. Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out In Development Plans.
- C. Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

#### Policy D12 Fire Safety

- A. 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 and ensure that they
  - 1) Identify suitably positioned inobstructed outside space:
    - a. For fire appliances to be positioned on
    - b. Appropriate for use as an evacuation assembly point
  - 2) Are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
  - 3) Are constructed in an appropriate way to minimise the risk of fire spread
  - 4) Provide suitable and convenient means of escape, and associated evacuation strategy for all building users
  - 5) Develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in

- B. All major development proposals should be submitted with a Fire Strategy, which is an independent fire strategy, produced by a third party, suitably qualified assessor.  
The statement should detail how the development proposal will function in terms of:
- 1) The building's construction: methods, products and materials used, including manufacturers' details
  - 2) The means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
  - 3) Features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
  - 4) Access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
  - 5) How provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
  - 6) Ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures

#### Policy D13 Agent of Change

- A. The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby.
- B. Development should be signed to ensure that established noise and other nuisance-generating users remain viable and can continue or grow without unreasonable restrictions being placed on them.
- C. New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.
- D. Development proposals should manage noise and other potential nuisances by:
- 1) Ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area
  - 2) Exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations
  - 3) Separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound proofing, insulation and other acoustic design measures
- E. Boroughs should normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed.

## Policy D14 Noise

- A. In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
  - 1) Avoiding significant adverse noise impacts on health and quality of life
  - 2) Reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
  - 3) 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.
  - 4) Improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
  - 5) Separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation
  - 6) Where it is possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
  - 7) Promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver
- B. Boroughs, and other with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with procedure in Defra's Noise Action Plan for Agglomerations.

## Policy H2 Small sites

- A. Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan making in order to:
  - 1) Significantly increase the contribution of small sites to meeting London's housing needs
  - 2) Diversify the sources, locations, type and mix of housing supply
  - 3) Support small and medium sized housebuilders
  - 4) Support those wishing to bring forward custom, self-build and community led housing
  - 5) Achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.
- B. Boroughs should:
  - 1) Recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites
  - 2) Where appropriate, prepare site specific briefs, masterplans and housing design codes for small sites
  - 3) Identify and allocate appropriate small sites for residential development
  - 4) List these small sites on their brownfield registers
  - 5) Grant permission in principle on specific sites or prepare local development orders.

## Policy H8 Loss of existing housing and estate redevelopment

- A. Loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.
- B. Loss of hostels, staff accommodation and shared and supported accommodation that meet an identified housing need should be satisfactorily re-provided to an equivalent or better standard.

Paragraph 4.13.14 states Care home accommodation (C2) is an important element of the suite of accommodation options for older Londoners and this should be recognised by boroughs and applicants.

## Policy E10 Visitor Infrastructure

- C. A sufficient supply and range of serviced accommodation should be maintained.

## Policy G7 Trees and Woodlands

- A. London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
- B. In their Development Plans, boroughs should:
  - 1) Protect 'veteran' trees and ancient woodland where these are not already part of a protected site
  - 2) Identify opportunities for tree planting in strategic locations
- C. Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments, particularly large canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

## Policy SI 1 Improving air quality

- A. Development plans, through relevant strategic, site specific and area based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.
- B. To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:
  - 1) Development proposals should not:
    - a. Lead to 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
    - c. Create unacceptable risk of high levels of exposure to poor air quality.
  - 2) In order to meet the requirements in Part 1, as a minimum:
    - a. Development proposals must be at least Air Quality Neutral
    - b. Development proposals should use design solutions to prevent or minimise increased exposure to existing air



- pollution and make provision to address local problems of air quality in preference to post design or retro fitted mitigation measures
- c. Major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1
- d. Development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.
- C. Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:
  - 1) How proposals have considered ways to maximise benefits to local air quality, and
  - 2) What measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.
- D. In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.
- E. Development proposals should ensure that where emissions need to be refused to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.

#### Policy SI 5 Water Infrastructure

- C. Development proposals should:
  - 1) Through the use of Planning Conditions minimise the use of mains water in line with the Optional Requirements of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)
  - 2) Achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent (commercial development)
  - 3). Incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower rate consumption rates and to maximise future proofing.
- E. Development proposals should:
  - 1) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided
  - 2) take action to minimise the potential for misconnections between foul and surface water networks.

#### Policy SI 7 Reduce waste and supporting the circular economy

Design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

## Policy SI 12 Flood risk management

C. Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

## Policy SI 13 Sustainable drainage

B. Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:

- 1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
- 2) rainwater infiltration to ground at or close to source
- 3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
- 4) rainwater discharge direct to a watercourse (unless not appropriate)
- 5) controlled rainwater discharge to a surface water sewer or drain
- 6) controlled rainwater discharge to a combined sewer.

## Policy T1 Strategic approach to transport

All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

## Policy T4 Assessing and mitigating transport impacts

- D. The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.
- E. Development proposals should not increase road danger.

## Policy T5 Cycling

- A. Development proposals should help remove barriers to cycling and create a health environment in which people choose to cycle. This will be achieved through:
- 1) Supporting the delivery of a London wide network of cycle routes, with new routes and improved infrastructure
  - 2) Securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Development should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.
- B. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater larger cycles, including adapted cycles for disabled people.

## Policy T6 Car parking

- A. Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.
- B. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car lite'). Car-free development has no general parking, but should still provide disabled persons parking in line with Part E of this policy.
- C. An absence of local on street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.
- D. The maximum car parking standards set out in Policy T6.1 Residential parking to Policy T6.5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.
- E. Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6.1 Residential parking to Policy T6.5 Non-residential disabled persons parking.
- F. Where provided, each motorcycle parking space should count towards the maximum for car parking space at all use classes.
- G. Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with Policy T6.1 Residential parking, Policy T6.2 Office Parking, Policy T6.3 Retail parking, and Policy T6.4 Hotel and leisure uses parking. All operational parking should make this provision, including offering rapid charging. New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities.
- H. Where electric vehicle charging points are provided on-street, physical infrastructure should not negatively affect pedestrian amenity and should ideally be located off the footway. Where charging points are located on the footway, it must remain accessible to all those using it including disabled people.
- I. Adequate provision should be made for efficient deliveries and servicing and emergency access.
- J. A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.
- K. Boroughs that have adopted or wish to adopt more restrictive general or operational parking policies are supported, including borough-wide or other area based car free policies. Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6.1 Residential Parking) must only do so for parts of London that are PTAL 0-1. Inner London boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential uses classes in any part of London.
- L. Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail is redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.

## Policy T7 Deliveries, servicing and construction

- A. Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road.
- C. To support carbon free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported.
- G. Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way, which reflects the scale and complexities of developments.
- H. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.
- K. During the construction phase of development, inclusive and safe access for people walking or cycling should be priorities and maintained at all times.

## Accessible London SPG

### Local Policies

#### Hillingdon Local Plan

The Local Plan Part 1 - Strategic policies sets out the overall level and broad locations of growth up to 2026. Together with the Local Plan Part 2 Development Management Policies and Site Allocations and Designation documents it forms the Council's future development strategy for the borough.

The Local Plan Part 1 – Strategic policies contains the following relevant policies:

Policy HE1: Built Environment  
Policy EM8: Land, Water, Air and Noise  
Policy T1: Accessible Local Destinations  
Policy CI1: Community Infrastructure Provision

The Local Plan Part 2 – Development Management Policies contains the following relevant policies:

#### DMH8 Sheltered Housing and Care Homes

- A) The development of residential care homes and other types of supported housing will be permitted provided that:
  - i) It would not lead to an over concentration of similar uses detrimental to residential character or amenity and complies with Policy DMH4: Residential Conversions;
  - ii) It caters for need identified in the Council's Housing Market Assessment, in a needs assessment of a recognised public body, or within an appropriate needs assessment and is deemed to be responding to the

- needs identified by the Council or other recognised public body such as the Mental Health Trust;
  - ii) The accommodation is fully integrated into the residential surroundings; and
  - iii) In the case of sheltered housing, it is located near to shops and community facilities and is easily accessible by public transport.
- B) Proposals for residential care establishments which fall under Use Class C2 must demonstrate that they would provide levels of care as defined in Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended).

DMHB11 Design of New Development

DMHB12 Streets and Public Realm

DMHB14 Trees and Landscaping

DMHB15 Planning for Safer Places

DMEI1 Living Walls and Roofs and Onsite Vegetation

DMEI10 Water Management, Efficiency and Quality

DMT1 Managing Transport Impacts

DMT2 Highways Impacts

DMT5 Pedestrians and Cyclists

DMT6 Vehicle Parking

### **Principle of Development**

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

Policy GG2 of the London Plan (Making the best use of land) states that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land, particularly on sites within and on the edge of town centres, as well as utilising small sites wherever possible.

Moreover, Policy GG4 (Delivering the homes Londoners need) sets out that to create a housing market that works better for all Londoners, those involved in planning and development must ensure that more homes are delivered, proactively exploring the potential to intensify the use of land and promoting higher density development in appropriate locations. Policy GG3 of the London Plan (Creating a healthy city) requires developments to address mental and physical health in an integrated and co-ordinated way, reducing health inequality where possible, which includes planning for appropriate health and care infrastructure to address the needs of London's changing and growing population.

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





Furthermore, Policy D2 sets out that where existing infrastructure capacity is insufficient to support proposed densities (including the impact of cumulative developments), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time.

Policy H8 of the London Plan (Loss of existing housing and estate redevelopment) sets out that any loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. This is to ensure that the redevelopment and intensification of London's housing stock continues to play an important role in the provision of new homes across London and to ensure that where housing is lost, it does not lead to a net reduction in places for people to live. This is effectively enshrined at a local level by Policy DMH 1 of the Hillingdon Local Plan Part 2: Development Management Policies (January 2020) (Safeguarding Existing Housing), which sets out that the net loss of self-contained housing will be resisted unless the lost housing is replaced with at least an equivalent amount of residential floorspace.

The loss of the existing housing should be considered against the provision of a new care home, and the supporting text to Policy H13 of the London Plan (Specialist older persons housing) outlines that care home accommodation (C2 use class) is an important element of housing choice for Londoners and this should be recognised in planning decisions. If accommodation provides personal care and accommodation together as a package with no clear separation between the two, if the person using the service cannot choose to receive personal care from another provider, if people using the service do not hold occupancy agreements, or if the building would likely incorporate Care Quality Commission (CQC) regulated activity, it will be considered as 'accommodation for persons who require nursing or personal care' (i.e. a care home) for the purposes of the London Plan.

The proposed development meets the definition of 'care home accommodation' as defined by the London Plan as the building will incorporate Care Quality Commission (CQC) regulated activities for persons who require nursing and personal care.

Policy DMH 8 of the Hillingdon Local Plan Part 2: Development Management Policies (January 2020) (Sheltered Housing and Care Homes) sets out that the development of residential care homes will be allowed provided that the development would not lead to an overconcentration of similar uses in an area which would be detrimental to residential amenity, whilst the proposed accommodation should fully integrate into the residential surroundings, and in the case of sheltered housing, should be located near to shops and community facilities and be easily accessible by public transport.

As part of this consideration, a 'Needs Assessment' accompanies this submission which demonstrates that it will cater for local demand. The Needs Assessment has been informed by both the demographic makeup and socio-economic data of the area as well as an audit of existing facilities and services. The Needs Assessment demonstrates that the level of care provided on site is personal care for people in need of such care (e.g. by reason of old age, disablement or past or present mental disorder) and that it will include a level of medical care and treatment.

It is further important to note that the supporting text to Policy H1 of the London plan states that unlike student accommodation and other types of shared accommodation, net non-self-contained accommodation for older people

(falling within the C2 Use Class) should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home. The reasoning behind this is that the creation of targeted supported housing should free up self-contained housing elsewhere in the borough, and implies that the development of uses falling within the C2 use class has a similar impact on meeting annual housing targets as providing C3 residential uses, albeit indirectly.

In this regard, the London Plan sets out that to meet the predicted increase in demand for care home beds, London needs to provide an average of 867 care home beds a year until 2029, and this is not divided by borough but is expressed as an overall London-wide need. At present, the provision of Care Quality Commission rated 'Good' or 'Outstanding' care home beds is growing at around 3,525 bedspaces a year in London and provision of dementia-capable bedspaces at a rate of 2,430 places a year.

Having regard to the requirements of Policy H8 of the London Plan and Policy DMH 1 of the Hillingdon Local Plan Part 2, which both seek to protect existing housing stock, it is recognised that the proposal would lead to the loss of three self-contained residential properties and one B&B, contrary to the general policy objectives of protecting existing residential uses. However, both Policy H8 and DMH 1 allow the loss of residential accommodation, and in fact support redevelopment proposals, if it can be demonstrated that redevelopment would lead to higher densities in sustainable locations. The total combined floorspace of the existing houses is 392 sqm, however it is clear that the redevelopment of the site would provide a much higher quantum of floorspace (approx. 3,053 sqm) and would result in the net provision of 57 additional units, which is considered to represent a significant increase in residential accommodation. This clearly demonstrates how the relevant policy tests in terms of residential floorspace and units have been met. The loss of the B&B does not count towards the provision of existing residential floorspace (324 sqm) as it falls within the C1 use class.

It should be recognised that the borough of Hillingdon, like much of London, has an aging population, with the over-65 and over-85 age groups predicted to increase by 7.1% and 8% respectively, compared to an average of a 5% increase for the younger age groups. The cover letter (23rd November 2021) sets out some information relating to the supply and need for specialist housing, both across London and more specific to Hillingdon, and it is agreed that there is general demand for care home bedrooms established by the London Plan and Hillingdon Local Plan, identified by the relevant SHMAs. However, there is no discussion on the demographic make-up or the socio-economic data of the area (or borough), or an audit of existing facilities and services serving the same identified need. Nevertheless a Needs Assessment has been submitted in support of this application. Details of discussions with the Care Commissioning Group (CCG) and/or Care Quality Commission (CQC), which should provide confidence that the proposal has merit and the design is fit for purpose.

Overall, it is considered that the redevelopment to provide a care home would be acceptable in principle, making effective use of a brownfield site to deliver accommodation specifically for the older age groups, supporting a higher density and indirectly improving access to C3 residential uses elsewhere in the local area.

### **Impact on the character of the area**

Strategic Policy BE1 of the Local Plan: Part 1 requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods. Policy DMHB 11 of the Local Plan: Part 2 states that all development will be required to be designed to the highest standards and, incorporate principles of good design including:

- iv) Harmonising with the local context by taking into account the surrounding:
  - a. Scale of development, considering the height, mass and bulk of adjacent structures;
  - b. Building plot sizes and widths, plot coverage and established street patterns;
  - c. Building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
  - d. Architectural composition and quality of detailing;
  - e. Local topography, views both from and to the site; and
  - f. Impact on neighbouring open spaces and their environment.
- v) Ensuring the use of high quality building materials and finishes;
- vi) Ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- vii) Protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and undesignated, and their settings; and
- viii) Landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure

Chapter 3 Design of the London Plan sets out a series of overarching design principles for development in London and policy D4 Delivering good design seeks to promote world class, high quality design.

In addition, policy D3 of the London Plan states that all development must make the best use of land by following a design led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site.

A Design and Access Statement has been submitted in support of this application that explains the design led approach to the site.

The proposal seeks demolition of three houses and a B&B. These buildings do make a positive contribution towards the streetscene, but they are not particularly unique and having regard to the need to make the most effective use of land, which involves intensification in sustainable locations, it is considered that individually and as a group, their loss would not be particularly harmful to the overall residential character of the area.

The revised proposal hereby submitted has been reduced in its overall scale and massing, with a significantly reduced maximum height of 10.8m, reduced from 13.7m previously, which corresponds with a reduction in the overall floorspace proposed to just over 3,000 sqm. Consequently, the revised scheme would appear as a two and half storey building, which steps down to storeys towards the north, near to the boundary with No. 4 Pield Heath Avenue.

At pre-application stage, the Council found the scale, massing and design to be acceptable, reflecting a good balance between the need to make the best use of the site and the need to respect the scale of the surrounding built form. The proposal steps down appropriately to neighbouring buildings, and whilst

this will still result in an increase in built form within the site, the building would be sited a sufficient distance away from No. 4 Pield Heath Avenue (to the North) and No. 12 Pield Heath Road (to the East) to ensure the proposal makes a legible transition in height at streetscene level.

Since the pre-application, further improvements to the design of the scheme has been carried out including further reductions in mass and scale. Also, the entrance has been improved to better activate the building. Hardsurfacing has been removed from the wider site and a enhanced soft landscaping strategy proposed.

For the reasons set out in the Design and Access Statement, the proposal is considered to meet policies DMHB 10 and BE1 of the Local Plan, and policies D3 and D4 of the London Plan in terms of the quality of its deisgn and how it would fit in with the context.

### **Impact on neighbours / adjacent sites**

The proposal involves the consolidation of Nos. 14-18 Pield Heath Road & 2 Pield Heath Avenue. The resulting site measures 2,691 sqm and is situated on a corner plot with Pield Heath Road to the south and Pield Heath Avenue to the west.

The 2 nearest properties to the development are No. 12 Pield Heath Road and No. 4 Pield Heath Avenue.

Care has been taken in the layout and design of the proposal to ensure that the development would not harm the residential amenity of these neighbours. The development would comply with the 45 degree rule to the nearest residential windows belonging to each of these properties. Therefore, the proposal would not affect the outlook from any window serving neighbouring properties.

This application is also supported by a Dayligth and Sunlight Report which demonstrates that the proposal would not adversely affect any neighbouring properties in terms of daylight, sunlight and overshadowing.

Also, care has been taken to ensure there would be no overlooking from the site by separating any newly proposed windows 21m from existing neighbours windows.

As such, the proposals are not considered to harm the residential amenity of neighbouring properties.

### **Living conditions for future occupiers**

The main entrances to the building would be level and the communal corridor would have a rational arrangement with the provision of lifts and a stair core to service the development conveniently located.

Dining rooms, kitchens, laundry and staff accommodation appropriate to the scale of the development will be provided. Including provison for hair & beauty, treatment rooms, a cinema, and general nursing space.

The individual rooms are of an apporiate size and accessible. All of the rooms will have access to a good standard of daylight and outlook.

Staff accommodation will mainly be at basement level where most of the back of house servicing will be carried out.

Overall, the proposed accommodation is considered to be of a high standard to the benefit of future occupiers. Please refer to the Design and Access Statement for more details.

## **Transport**

### Access, Traffic, Servicing, Highway & Pedestrian Safety

DMT1 Managing Transport Impacts of Hillingdon's Local Plan: Part 2 – Development Management Policies states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

DMT2 Highways Impacts of Hillingdon's Local Plan: Part 2 – Development Management Policies states that development proposals must ensure that safe and efficient access to the highway network is provided; the proposal does not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents; safe and convenient facilities for pedestrians and cyclists are provided; impact on local amenity and congestions are minimised by routing through traffic by the most direct means; there is suitable mitigation measures to address any traffic impacts.

DMT5 Pedestrians and Cyclists of Hillingdon's Local Plan: Part 2 – Development Management Policies states that development proposals will be required to provide safe, direct and inclusive access for pedestrians and cyclists and for development along the Blue Ribbon Network it is required that they enhance and facilitate inclusive, safe and secure pedestrian and cycle access to the network.

Policy T1 Strategic approach to transport of the London Plan states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Policy T4 Assessing and mitigating transport impacts of the London Plan states that the cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated. Also, development proposals should not increase road danger.

A Transport Statement has been submitted in support of this application. Also, a Travel Plan accompanies the submission. For full details of transport related matters, please to these documents.

The site currently benefits from 4 separate crossovers. 1 along Field Heath Avenue and 3 separate accesses onto Field Heath Road. The proposal seeks to reduce the number of accesses to 2 with ingress/egress from Field Heath Avenue and the existing access on Field Heath Road.

The reduction of crossovers onto the busier Field Heath Road is considered to improve highway safety and provide more refuge for pedestrians.

In terms of traffic, there is currently a range of uses on the site. These would be replaced with a 60 bed care home. Occupiers of the development are not expected to have vehicles, although it is recognised that there will be staff parking, visitors and deliveries to the premises. However, given the scale of the development, the proposal is not considered to increase traffic significantly on surrounding roads.



It is recognised that safe and efficient servicing will need to be ensured. Servicing for the development would occur onsite and be accessed from the Field Heath Avenue entrance. The site will operate a 1 way system which means that all servicing vehicles enter and exit the site in forward gear.

Refuse on collection day would be located at the side of the building and can be collected safely on site without obstructing the public highway or raising any highway safety concerns.

The proposal is considered to provide safe access and safeguard the highway network in accordance with policies DMT1, DMT2, and DMT5 of the Hillingdon's Local Plan: Part 2 – Development Management Policies; and policies T1, T4, and T7 of the London Plan.

### Parking

DMT6 Vehicle Parking of Hillingdon's Local Plan: Part 2 – Development Management Policies sets the local parking standards required for development.

Policy T6 Car parking of the London Plan sets maximum standards for various types of uses. However, no specific standards are provided for nursing home accommodation.

Policy DMT6 of Hillingdon's Local Plan provides more specific requirements for residential institutions (including care homes). It recommends that 1 space per 3 staff should be provided. It is anticipated that approximately 20 staff would be working at the establishment at any one time. The development as shown provides for 14 parking spaces and an additional delivery/visitor bay and an ambulance bay. The applicant runs a number of similar nursing homes in West London and they consider this level of parking appropriate for the proposed use. No additional parking for staff would be required as many of the staff are likely to live locally. As such, the proposal would not be considered to increase on street car parking.

In addition to vehicle parking, the proposal would include parking for 8 cycles. This will further reduce dependency on the motor vehicle and will encourage alternative green modes of transport.

Given the site's PTAL and the nature of the proposed development, the overall level of parking provision would be considered acceptable, in accordance with policy DMT6 Vehicle Parking of Hillingdon's Local Plan: Part 2 – Development Management Policies; and policies T5, and T6 of the London Plan.

### **Tree, landscaping & Urban Green Factor**

Policies DMHB14 Trees and Landscaping and DMEI1 Living Walls and Roofs and Onsite Vegetation of the Local Plan Part 2 – Development Management Policies refers to the need for development proposals to retain or enhance existing landscaping, trees, biodiversity or other natural features and to provide greater urban greening.

Chapter 11 of the National Planning Policy Framework (2012) states that 'the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes'.

An Arboricultural Report has been prepared by Syntegra to support this application. The existing site contained no trees or soft landscaping of ecological or amenity value. The proposal would provide soft landscaping to

the front, side and rear. The proposal could accommodate new tree planting to improve the character and appearance of the streetscene. See Landscape Strategy prepared by Syntegra for more details.

The development also achieves an Urban Green Factor rating of 0.4 which is compliant with the London Plan.

Nevertheless, the Applicant would be satisfied to provide more details of the landscaping strategy by means of a condition should it be considered necessary. Subject to condition, the proposal would be considered to provide acceptable landscaping and improve the visual and ecological amenity of the site in accordance with adopted policy.

### **Noise**

Policy EM8 'Land, Water, Air and Noise' of the Local Plan Part 1 – Strategic Policies and policies D3, D13, and D14 of the London Plan refer to the need for new residential accommodation to offer appropriate amenity safeguarded from excessive noise exposure.

The proposed development is unlikely to impact neighbouring properties given its use and location. Also, given the residential character of the area, future residents are unlikely to suffer from exposure to excessive noise. A Noise Impact Assessment prepared by Syntegra supports this application. For more details on how this proposal would comply with adopted policy with regards to noise please refer to this report.

### **Sustainability**

Policy SI2 Minimising greenhouse gas emissions of the London Plan; and policy DME2: Reducing Carbon Emissions of the Local Plan Part 2 Development Management Policies states that development proposals should make the fullest contribution to minimising carbon dioxide emissions.

An Energy Strategy prepared by Syntegra sets out how the development has sought to minimise carbon emissions. The proposed site will be built under Part L 2013 (with 2016 amendments) of the Building Regulations and in line with the London Plan target to achieve a minimum 35% CO2 reduction over the baseline using the new draft SAP10 carbon factors.

The development will reduce regulated CO2 emissions by integrating a range of passive design and energy efficiency measures throughout the building. These measures include improving building fabric standards beyond the requirements of Part L of the Building Regulations. Also, the use of air source heat pumps and PV will be deployed to improve the sustainability of the development. These measures as set out in the Energy Strategy (SAP calculations & accompanying Mayor's Carbon Emissions Reporting Spreadsheet) enable the proposed scheme to go beyond Target Emission Rates (TER) and Target Fabric Energy Efficiency (TFEE) minimum standards via 'be lean', 'be clean', and 'be green' measures.

The Energy Statement prepared by Couchperrywilkes sets out that the energy strategy for the proposed development achieves a 56% reduction in CO2 emissions over Part L 2013 regulations, in accordance with local, regional and national planning policy.

## Air Quality

Policies GG3 and SI1 of the London Plan refer to the need to improve air quality in London to improve health and wellbeing.

Policy EM8 '*Land, Water, Air and Noise*' of the Local Plan Part 1 – Strategic Policies states that all development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum.

Policy DMEI 14 '*Air Quality*' of the Local Plan Part 2 – Development Management Policies states that Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Development proposals should, as a minimum:

- i. Be at least 'air quality neutral';
- ii. Include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
- iii. Actively contribute towards the improvement of air quality, especially within the Air Quality Management Area;

The site is located within an Air Quality Management Area so an Air Quality Assessment is required. An Air Quality Assessment prepared by Syntegra Consulting has been submitted with this application. Potential emissions from the development were assessed to determine compliance with the air quality neutral requirements of the London Plan. The results show an acceptable level of building and transport emissions from the scheme. As such, the proposed development is air quality neutral, in accordance with policy DMEI 14 '*Air Quality*' of the Local Plan Part 2 – Development Management Policies and SI1 of the London Plan.

## Flood Risk / Drainage

The EA Flood Zone map shows that the site is located in Flood Zone 1 which is the lowest risk level of flooding. Nevertheless, a FRA and drainage strategy has been prepared in support of this application.

The Flood Risk Assessment prepared by Syntegra explains that the site is within Flood Zone 1 and has a very low risk of fluvial flooding. All other sources of flooding for the site have been investigated and shown to be of minimal or no risk.

The Drainage Strategy which is also part of the same report prepared by Syntegra concludes that the existing site has a well connected drainage system and the proposal includes sustainable drainage measures that will reduce runoff rates to the betterment of flood risk.

Overall, the proposed drainage strategy for the development is considered acceptable and the risk from flooding is considered to be low, in accordance with policy EM6 Flood Risk Management of Hillingdon's Local Plan: Part 1; policy DMEI9 Management of Flood Risk of Hillingdon's Local Plan: Part 2; and policies SI 12 Flood Risk Assessment and SI 13 Sustainable Drainage of the London Plan.

## **Other Matters**

At formal pre-application stage, the Council requested that a Basement Impact Assessment be prepared to accompany any future application. A Basement Impact Assessment prepared by GA Gawn Associates has been submitted in support of this proposal which is considered to provide sufficient detail to give comfort about the proposed basement.

The site has been used for habitation for a long time and there is no evidence that the site has ever been used for a use that would be likely to lead to contamination of the site. Therefore, the site is unlikely to raise any specific contamination issues.

Lastly, a Fire Plan has been submitted alongside this application which shows that a Fire Tender can gain access to the site and manoeuvre around it adequately. In addition, the plan shows all the main escape routes from the building. Further details of fire safety will be needed at the working drawings stage of the development process. At this stage, the development will be required to meet Building Regulations standards and given the layout proposed, the development will achieve the necessary standards.

## **Conclusion**

In conclusion, there is Local and London Plan support for making more efficient use of sustainable, underutilised brownfield sites for the delivery of care home accommodation. The institutional population for Hillingdon is projected to increase to around 7,600 persons over the period 2014-36 and although many older people are living healthier longer independent lives, there is still a identified need for institutional establishments such as the development hereby proposed. Therefore, the principle of delivering high quality residential care accommodation is considered acceptable, subject to meeting the other requirements of policy DMH8 of the Local Plan.

The site is located within close proximity of Hillingdon Hospital, but despite this, the area is generally characterised by residential properties and as such the proposal would not lead to an over concentration of similar uses detrimental to residential character or amenity of the area.

In terms of the design approach, the pre-application advice from the Council has been followed and the scheme reduced from 72 to 60 rooms and from 4 storeys to 2 and half storeys. The Council was welcoming of this design, including in terms of scale and bulk and the proposal was considered to be in keeping with the character of the area whilst optimising the use of the site in accordance with adopted policy.

The proposal would provide a proportionate level of car parking for this sustainable location and 8 cycle parking spaces in accordance with policy to encourage alternative green modes of transport.

Overall, the approach to this development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the London Plan as well as the aims and objectives of Council's Local Plan.