



PROGRESS PLANNING

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## Planning Statement

Squirrels Estate, Hayes, UB3 4RY

Erection of part 11 storey, part 10 storey mixed use building comprising 116 residential dwellings and ground level commercial premises along with public realm delivery of Green Super Highway with associated landscaping, access, and parking, following demolition of existing buildings.

Prepared by Progress Planning on behalf of:

Mackenzie Homes Ltd

October 2022

## Table of Contents

|   |                  |
|---|------------------|
| <b><u>EXECUTIVE SUMMARY</u></b>   | <b><u>2</u></b>  |
| <b><u>THE SITE</u></b>  | <b><u>3</u></b>  |
| <b><u>PROPOSED DEVELOPMENT</u></b>  | <b><u>4</u></b>  |
| <b><u>PLANNING HISTORY</u></b>  | <b><u>4</u></b>  |
| <b><u>PLANNING POLICY</u></b>   | <b><u>4</u></b>  |
| <b><u>PRINCIPLE OF DEVELOPMENT</u></b>  | <b><u>13</u></b> |
| <b><u>DENSITY OF THE PROPOSED DEVELOPMENT</u></b>                                   | <b><u>16</u></b> |
| <b><u>HOUSING MIX AND AFFORDABLE HOUSING</u></b>                                    | <b><u>17</u></b> |
| <b><u>IMPACT ON THE CHARACTER OF THE AREA &amp; SETTING OF LISTED BUILDINGS</u></b> | <b><u>17</u></b> |
| <b><u>LIVING CONDITIONS FOR FUTURE OCCUPIERS/USERS</u></b>                          | <b><u>22</u></b> |
| <b><u>TRANSPORT</u></b>   | <b><u>24</u></b> |
| <b><u>RENEWABLE ENERGY &amp; SUSTAINABILITY</u></b>                                 | <b><u>26</u></b> |
| <b><u>FLOODING OR DRAINAGE ISSUES</u></b>   | <b><u>27</u></b> |
| <b><u>NOISE</u></b>   | <b><u>27</u></b> |
| <b><u>AIR QUALITY</u></b>   | <b><u>28</u></b> |
| <b><u>CONTAMINATION AND ARCHAEOLOGY</u></b>   | <b><u>28</u></b> |



## Executive Summary

This statement has been prepared by Progress Planning on behalf of Mackenzie Homes Ltd to support an application proposal for redevelopment of the site to erect a part 11 storey, part 10 storey mixed use building comprising 116 residential dwellings and ground level commercial premises along with public realm delivery of Green Super Highway with associated landscaping, access, and parking, following demolition of existing buildings.

In terms of principle of development, there is Local and London Plan support for making more efficient use of sustainable, underutilised brownfield edge of town centre sites within Opportunity Areas, within which the site is located, for the delivery of housing. This proposal has directly sought to address the concerns raised at the pre-application stage and now ensures that the building line aligns with the Milk Yard, neighbouring scheme and assists realise the full potential of the Green Super Highway.

The design will deliver genuine improvements to the streetscape unlocking the key East to West connection along the Green Super Highway. The provision of a modern, sensitively designed building which reflects the wider aspirations of the masterplan (as produced in the 3 Viveash Close application) and enables the deliverability of site “B” of SA 5 to come forward delivering potentially 500 residential units (some 200 units more than its allocation). See ‘Principle of Development’ section of this report for more details.

Work previously undertaken by TateHindle in the 3 Viveash Close application shows how all the rest of site “B” can be delivered independently on their existing land ownership parcels without prejudicing each other. This level of work undertaken by TateHindle who are also engaged on the application at No. 9 Nestles Avenue and 3 Viveash Close ensures a wholistic and common approach throughout the site allocation to the benefit of the Local Authority who receive more housing than it is currently allocated for. The key to unlocking site “B” of SA 5 is to ensure that the Squirrels Estate parcel of land can come forward independently and at an appropriate quantum that fits with the wider context and the evolving masterplan. This application seeks to do this and is supported with a robust assessment of how this site can deliver the critical Green Super Highway across the entire site allocation whilst also delivering 116 units to ensure it is viable, by offsetting the profit loss to deliver the Green Super Highway.

This statement should be read alongside the accompanying reports submitted with this application, including the Design and Access Statement prepared by TateHindle and the Sustainability Appraisal/Infrastructure Assessment prepared by Progress Planning.

Overall, the approach to this development would reflect the 17 global goals of sustainable development as set out in the NPPF. The application meets the strategic policy objectives of the London Plan as well as the aims and objectives of local Council policy. Therefore, this proposal should be allowed to deliver much needed good quality homes for residents of Hillingdon and Londoners more widely.

## The Site

The application site comprises two separate 2-storey industrial buildings which are further subdivided into 7 individual commercial units. The existing buildings measure approximately 650 sqm and 684 sqm in footprint with the existing floorspace as measured by Colliers is 1,268.7 sqm. The site is bound to the north by 4 Viveash Close, to the east by the Nestles Conservation Area and former Nestles Factory development and to the south by Nos. 7 & 9 Nestles Avenue.

The application site is one of several light industrial units, also home to self-storage units, a car museum and car rental & repair shops. Surrounding buildings are of a similar functional industrial style ranging from one to three storeys in height. The buildings have large windows and are built from metal cladding or brick. A large portion of the site is allocated to car parking for workers employed within the buildings.

The site is located within the wider Nestles Avenue industrial cluster – previously designated within the Hillingdon Saved UDP Policies (November 2012) as Strategic Industrial Location (SIL) which has now been superseded by the Council's adopted Local Plan. In the recently adopted Hillingdon Local Plan, the application site is included as part of Site "B" within Policy SA 5 (Land to the South of the Railway, including Nestle Site, Nestle Avenue, Hayes) of the Local Plan: Part 2 Site Allocations and Designations (Proposed Modifications 2018). This allocation identifies the land and the surrounding buildings for release from industrial use to residential.

The area around Viveash Close has started to be redeveloped in recent years. There are several recently approved tall buildings in the vicinity, namely the recently approved Vinyl Factory, Former Nestles Factory, and the High Point Village schemes which have enhanced the character of the area and set the precedent for future developments, as well as 9 Nestles Avenue.

Another application that was submitted by the same applicant (Mackenzie Homes) was approved at planning committee in July 2022 which secured the redevelopment of 3 Viveash Close, this forms the land to the North of 4 Viveash Close.

The Nestles Avenue industrial cluster comprised approximately 34 hectares of land south of the railway, and extended eastwards from Station Road, across Squirrels Trading Estate and North Hyde Gardens, encompassing the electricity substation and land beneath the Hayes Bypass. Having undertaken a review of employment land in the borough, the Council released 16 hectares of SIL land within the Nestles Avenue industrial cluster (including the Squirrels Trading Estate) as part of its Local Plan Part 2 which was adopted in January 2020.

TfL's PTAL mapping tool indicates that the current PTAL for the site is of a good level standing at 4 and the land is in Flood Zone 1.



## Proposed Development

The proposal is for erection of part 11 storey, part 10 storey mixed use building comprising 116 residential dwellings and ground level commercial premises along with facilitating the public realm delivery of Green Super Highway with associated landscaping, access, and parking, following demolition of existing buildings.

## Planning History

Aside from a number of retrospective change of use applications and minor signage applications, it is considered there is no relevant planning history specific to the application site, however, planning applications for residential development have been approved to all sides of the site.

## 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 issued by both the London Borough of Hillingdon and GLA.

## National Planning Policy

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 5 of the NPPF refers to '*Delivering a sufficient supply of homes*'. Paragraph 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, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Chapter 9 of the NPPF refers to '*Promoting sustainable transport*'. Paragraph 105 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be considered in both plan-making and decision making.

Within this context, paragraph 112 states that applications for development should:

- a) Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) Create places that are safe, secure, and attractive – which minimise the scope for conflicts between pedestrians, cyclists, and vehicles, avoid

- unnecessary street clutter, and respond to local character and design standards;
- d) Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible, and convenient locations.

Paragraph 113 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

Chapter 11 of the NPPF refers to '*Making effective use of land*'. Paragraph 119 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 124 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.

Paragraph 125 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances:

- b) The use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and
- c) Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this framework. In this context, when considering applications for housing, authorities should 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).

Chapter 12 of the NPPF refers to '*Achieving well-designed places*'. Paragraph 126 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. 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 130 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 wellbeing, 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 134 states that significant weight to development which reflects local design policies and government guidance on design, considering any local design guidance and supplementary planning documents such as design guides and codes; and or outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area if they fit in with the overall form and layout of their surroundings.

Chapter 14 of the NPPF refers to *'Meeting the challenge of climate change, flooding and coastal change'*. Paragraph 154 states that new development should be planned for in ways that:

- a) Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) Can help to reduce greenhouse gas emissions, such as through its location, orientation, and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Chapter 15 of the NPPF refers to *'Conserving and enhancing the natural environment'* and paragraph 174 states that decisions should contribute to and enhance the natural and local environment.

Chapter 16 of the NPPF refers to *'Conserving and enhancing the historic environment'*. Paragraph 194 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include,

heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 197 states that in determining applications, local planning authorities should take account of:

- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) The desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 206 states that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

#### Regional Planning Policy

Policy GG1 *'Building strong and inclusive communities'* of the London Plan states that delivering good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspace in accessible locations, and social, physical, and environmental infrastructure that meets London's diverse needs is essential if London is to maintain and develop strong and inclusive communities.

To build on the city's tradition of openness, diversity, and equality, and help deliver strong and inclusive communities, those involved in planning and development must:

- provide access to good quality services and amenities that accommodate, encourage, and strengthen communities, increasing active participation and social integration, and addressing social isolation.
- ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish.
- ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.
- support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.



Policy GG2 *'Making the best use of land'* of the London Plan states that London's population is set to grow from 8.9 million today to around 10.8 million by 2041.

Making the best use of land means directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport, walking, and cycling networks. Integrating land use and transport in this way is essential not only to achieving the Mayor's target for 80 per cent of all journeys to be made by walking, cycling and public transport, but also to creating vibrant and active places and ensuring a compact and well-functioning city.

All options for using the city's land more effectively will need to be explored as London's growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London. New and enhanced transport links will play an important role in allowing this to happen, unlocking homes and jobs growth in new areas and ensuring that new developments are not planned around car use.

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

- 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
- prioritise sites which are well-connected by existing or planned public transport
- proactively explore the potential to intensify the use of land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- applying a design-led approach to determine the optimum development capacity of sites
- 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.

Policy GG3 *'Creating a healthy city'* of the London Plan states that to improve Londoners' health and reduce health inequalities, those involved in planning and development must:

- ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.
- promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices.
- use the Healthy Streets Approach to prioritise health in all planning decisions.
- plan for improved access to green spaces and the provision of new green infrastructure.

Policy GG4 *'Delivering the homes Londoners need'* of the London Plan states 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.
- support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable.

- create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.
- identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset.
- establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value

Chapter 2 of the London Plan gives a strategic framework for those parts of London that will see significant development over the lifetime of the Plan. The areas that will see the most significant change are identified as *Opportunity Areas*. Many of these Opportunity Areas are already seeing significant development, and they all have the potential to deliver a substantial amount of the new homes and jobs that London needs.

The London Plan has a clear focus on delivery – something that will require all stakeholders to work together to unlock sites and drive the right sort of development. Infrastructure is key to this delivery and will require major investment in transport, with Opportunity Areas clustered into growth corridors; and proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery.

Policy SD1 ‘Opportunity Areas’ of the London Plan states that to ensure Opportunity Areas fully realise their growth and regeneration potential, Boroughs, through Development Plans and decisions, should:

- 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas
- 2) Support development which creates employment opportunities and housing choice for Londoners.
- 3) Plan for and provide the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities, working with infrastructure providers where necessary
- 4) Recognise the role of heritage in place-making
- 5) Establish the capacity for growth in Opportunity Areas, taking account of the indicative capacity for homes and jobs in Table 2.1
- 6) Support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London’s economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution, co-location and substitution
- 7) Include ambitious transport node share targets
- 8) Support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration
- 9) Ensure planning frameworks are informed by public and stakeholder engagement and collaboration at an early stage and throughout their development

- 10) Work with the Mayor, local communities and other stakeholders to review appropriate locations and identify new Opportunity Areas. These should be distinct and significant locations that have capacity for at least 5,000 new jobs and/or 2,500 new homes
- 11) Take appropriate measures to deal with contamination that may exist

The Heathrow Opportunity Area forms part of the Elizabeth Line West area which is identified to deliver 13,000 homes. The area contains a range of opportunities to support London's economic development and deliver new housing and environmental improvements.

Chapter 3 Design of the London Plan contains the following relevant policies:

Policy D1 London's form, character, and capacity for growth  
Policy D2 Infrastructure requirements for sustainable densities  
Policy D3 Optimising site capacity through the design-led approach  
Policy D4 Delivering good design  
Policy D5 Inclusive design  
Policy D6 Housing quality and standards  
Policy D7 Accessible housing  
Policy D8 Public realm  
Policy D9 Tall buildings  
Policy D11 Safety, security, and resilience to emergency  
Policy D12 Fire safety  
Policy D13 Agent of Change  
Policy D14 Noise

Policy D2 '*Infrastructure requirements for sustainable densities*' of the London Plan states that the density of development proposals should consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels.

When a proposed development is acceptable in terms of use, scale, and massing, given the surrounding built form, uses and character, but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.

Policy D3 'Optimising site capacity through the design led approach' 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, including site allocations. 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, and that best delivers the requirements set out in Part D.

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 higher density buildings, expansion of the areas should be positively considered by Boroughs

where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.

Chapter 4 Housing of the London Plan contains the following relevant policies:

- Policy H1 Increasing housing supply
- Policy H4 Delivering affordable housing
- Policy H5 Threshold approach to applications
- Policy H6 Affordable housing tenure
- Policy H10 Housing size mix

Chapter 6 Economy of the London Plan contains the following relevant policies:

Policy E4 Land for industry, logistics and services to support London's economic function

Policy E5 Strategic Industrial Locations (SIL)

Chapter 7 Heritage and Culture of the London Plan contains the following relevant policies:

Policy HC1 Heritage conservation and growth

Chapter 8 Green Infrastructure and Natural Environment of the London Plan contains the following relevant policies:

Policy G4 Open space

Policy G5 Urban greening

Policy G7 Trees and woodland

Chapter 9 Sustainable Infrastructure of the London Plan contains the following relevant policies:

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions

Policy SI 4 Managing heat risk

Policy SI 5 Water infrastructure

Policy SI 12 Flood Risk Assessment

Policy SI 13 Sustainable drainage

Chapter 10 Transport of the London Plan contains the following relevant policies:

Policy T1 Strategic approach to transport

Policy T2 Healthy Streets

Policy T3 Transport capacity, connectivity and safeguarding

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy T6.1 Residential parking

Housing SPG

Affordable Housing and Viability SPG

Accessible London SPG

Play and Informal recreation SPG

#### Local Planning Policies

The Hillingdon 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 E1: Managing the Supply of Employment Land  
Policy E3: Strategy for Heathrow Opportunity Area  
Policy H1: Housing Growth  
Policy H2: Affordable Housing  
Policy HE1: Built Environment  
Policy EM1: Climate Change Adaptation and Mitigation  
Policy EM2: Green Belt, Metropolitan Open Land and Green Chains  
Policy EM3: Blue Ribbon Network  
Policy EM4: Open Space and Informal Recreation  
Policy EM6: Flood Risk Management  
Policy EM7: Biodiversity, and Geological Conservation  
Policy EM8: Land, Water, Air and Noise  
Policy T1: Accessible Local Destinations  
Policy T5: Crossrail  
Policy CI1: Community Infrastructure Provision

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

DME2 Employment Uses Outside of Designated Sites  
DMH2 Housing Mix  
DMH7 Provision of Affordable Housing

DMHB1 Heritage Assets  
DMHB11 Design of New Development  
DMHB12 Streets and Public Realm  
DMHB14 Trees and Landscaping  
DMHB15 Planning for Safer Places  
DMHB16 Housing Standards  
DMHB17 Residential Density  
DMBH18 Private Outdoor Amenity Space  
DMHB19 Play Space

DMEI1 Living Walls and Roofs and Onsite Vegetation  
DMEI2 Reducing Carbon Emissions  
DMEI7 Biodiversity Protection and Enhancement  
DMEI9 Management of Flood Risk  
DMEI10 Water Management, Efficiency and Quality  
DMEI14 Air Quality

DMCI2 New Community Infrastructure  
DMCI4 Open Spaces in New Development  
DMCI5 Children's Play Areas

DMT1 Managing Transport Impacts  
DMT2 Highways Impacts  
DMT5 Pedestrians and Cyclists  
DMT6 Vehicle Parking



## Principle of Development

This application scheme follows an approval relating to another site located within Site B which is also owned and being developed by Mackenzie Homes (3 Viveash Close). No. 9 Nestles Avenue being the other site approved within Site B. The application site would be the 3<sup>rd</sup> site to come forward within Site B and given its location, it is crucial to the successful delivery of Site B as it is situated between the Former Nestles Factory redevelopment to the East (Site C) and the Buccleuch redevelopment to the West (Site A) and is the linchpin to delivering the Green Super Highway for the masterplan area (see below).



*Emerging Overall Masterplan for Hillingdon Site Allocation SA5*

As mentioned above, an application (development comprising 103 units) for No. 9 Nestles Avenue, Hayes, has been approved at committee in February 2021 and an application for 3 Viveash Close (comprising 127 units) has also been approved at committee in July 2022. As such, discussions with neighbouring sites have continued and a full assessment has been undertaken by TateHindle of the masterplan area and how each of these land parcels can come forward without prejudicing any other or expecting another site to deliver a disproportionate contribution towards open space (See External Amenity Space / Public Open Space section below). Despite this quite successful exercise of producing a masterplan based on the parameters of site ownership, it is unfortunately the case that the application site (Squirrels Estate) will have a disproportionate burden of delivering the entirety of the Green Super Highway for Site B of the masterplan area and given its location, it is critical for the future success of the surrounding developments that it is delivered.

The principal of the sites redevelopment in the manner proposed is considered acceptable, some of the key economic, social and environmental benefits are outlined as being the delivery of 116 new homes making a significant contribution towards the borough's identified housing need, including a mix of housing types of which 62.9 per cent comprise of 2 or more bedroom dwellings. The project should it receive planning will create significant long and short term employment through the construction phase and maintenance of the residential and commercial unit. Notwithstanding CIL contributions, additional financial contributions are expected to be in the region of £813,276 secured under a Section 106 Contribution agreement, some of the elements considered in this might consist of local Transport, Air Quality, Energy, Infrastructure, the Public Realm enhancements and

the Travel Plan. The social and environmental benefit of the scheme is clear given two thirds of the site is given over to the creation of the Green Super Highway however, it is noted the Squirrels Estate is disproportionately impacted by the delivery of this. As the accompanying viability assessment highlights the site is currently unviable to deliver an affordable housing contribution, furthermore the proposal is costing £7,168,484 million in opportunity cost (foregone profit) in order to deliver the Green Super Highway (refer to the viability assessment). It is therefore appropriate based on the viability appraisal of the proposed scheme that no surplus could be put toward the provision of affordable housing in this instance. Fundamentally it is assessed a 0% affordable housing contribution is considered to make the scheme viable in delivering the Green Super Highway. The viability report provides a counterfactual scheme, which builds over the Green Super Highway and delivers some 198 units whilst maintaining the East to West public access. Please refer to the affordable housing section of this report and the viability assessment prepared by Gerald Eve.

The Project Team for the current application comprises many of the same professionals that secured consent on No. 3 Viveash Close and No. 9 Nestles Avenue. Therefore, there is strong sense of continuity in the design approach for Squirrels Estate. In addition, the applicant (Mackenzie Homes) is developing No. 3 Viveash Close and are continuing to pursue surrounding parcels of land for development.

The Project Team and Mackenzie Homes have been working closely with the Council's planning department to prepare a scheme that would unlock the Green Super Highway and deliver the wider benefits to the area from the redevelopment of the application site. Therefore, there is no doubt that this proposal is welcomed and the principle of bringing it forward for a residential led development is supported strongly.

Specific to its planning policy merits in terms of principle, this brownfield industrial site is allocated for release to residential use as part of Site "B" within Policy SA 5 (Land to the South of the Railway, including Nestle Site, Nestle Avenue, Hayes) of the Local Plan: Part 2 Site Allocations and Designations (Proposed Modifications 2018). This allocation identifies the land and the surrounding buildings for release from industrial use to primarily residential. Therefore, the loss of the existing industrial use has already been established/accepted.

In terms of the proposed residential, similarly, this has been established within the wider site allocation, however, it worth mentioning that Chapter 5 of the NPPF refers to *'Delivering a sufficient supply of homes'*. Paragraph 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, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The Council's 5-year supply of housing is not a cap on housing delivery but is a measure to ensure the minimum number of new homes are provided over the period.

Policy H1 (Housing Growth) of the Hillingdon Local Plan: Plan 1 – Strategic Policies (2012) requires that the borough meets and exceed its minimum strategic dwelling requirement in accordance with other Local Plan policies.

Policy GG4 *'Delivering the homes Londoners need'* of the London Plan states 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.

- support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable.
- create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.
- identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset.
- establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value

Policy H1 Increasing housing supply of the London Plan states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially on sites with existing or planned public transport access levels or which are located within 800m of a Tube station, rail station or town centre boundary and on sites where there would be mixed-use redevelopment of car parks and low-density retail parks.

Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, considering future public transport capacity and connectivity levels.

Chapter 2 of the London Plan gives a strategic framework for those parts of London that will see significant development over the lifetime of the Plan. The areas that will see the most significant change are identified as Opportunity Areas. As noted above, many of these Areas are already seeing significant development, and they all have the potential to deliver a substantial amount of the new homes and jobs towards satisfying the needs of London.

The London Plan has a clear focus on delivery – and that this will require all stakeholders to work together to unlock sites and drive the right sort of development in the right places. Infrastructure is key to this delivery and will require major investment in transport, with Opportunity Areas clustered into growth corridors; and proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery.

Policy SD1 Opportunity Areas states that to ensure Opportunity Areas fully realise their growth and regeneration potential, the Mayor will:

- ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities
- ensure that Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic, and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration

The site is located within the Hayes/West Drayton Growth Corridor and the Heathrow Opportunity Area forms part of the Elizabeth Line West area which is identified to deliver 13,000 homes. As noted above, the area contains a range of

opportunities to support London's economic development and deliver new housing alongside environmental improvements.

The proposed development would deliver 116 residential dwellings and the indicative masterplan shows how the whole of site "B" can come forward and deliver, without conflicting with other material considerations, delivering approximately 500 units which is nearly double the site allocation.

This Opportunity Area has been identified as a strategic location for the delivery of housing, in part as it is very well positioned to take advantage of the proximity to the Elizabeth Line and existing infrastructure – to this end the proposed design approach is genuinely successful. Indeed, in increasing the number of dwellings to be accommodated within the site whilst also not compromising on other acknowledged considerations, the principle of optimising the use of this site for the provision of additional residential accommodation is supported in strategic terms by policy H1 of the Local Plan: Part 1 – Strategic Policies (2012); policies GG4, H1 and SD1 of the London Plan; and the National Planning Policy Framework (2012).

### **Density of the proposed development**

The site has an area of 0.3 hectares and the proposal seeks to provide 116 units comprising 43 x 1 bedroom (37.1% of the total proposed); 55 x 2 bedroom (47.4%); and 18 x 3-bedroom units (15.5%). Therefore, the development would have a density of 386 units per hectare and 1,077 habitable rooms per hectare. This is significantly less than the densities approved elsewhere in Site B due to the burden of this site having to deliver the Green Super Highway, which occupied almost 2/3<sup>rd</sup> of the entire site land parcel. For comparison, the development approved at 3 Viveash Close, had a density of 557 units per hectare and 1,622 habitable rooms per hectare which, when comparing habitable room numbers, reveals a stark contrast the proposal comprising 35% less development.

Further observations can be made to the counterfactual scheme, which has been run in conjunction with the viability assessment. This scheme proposes a total of 198 units whilst still maintaining the public east west link. The density of which would result in 660 units per hectare. Considerably less development (58.48%) is proposed than the counterfactual scheme.

Policy D3 Optimising site capacity through the design-led approach 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, including site allocations. The design led approach requires consideration of design options to determine the most appropriate form of development that response to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity.

The accompanying Design and Access Statement prepared by Tatehindle shows how a range of options have been worked through with the Local Planning Authority, with the latest being the preferred approach to ensure the delivery of the Green Super Highway.

The site is within an Opportunity Area and in proximity of a Crossrail Station. The proposals as illustrated in the indicative masterplan in the previous section of this report would be compatible with the changing character and context of the site. Nonetheless, it is recognised that the London Plan emphasises good design, particularly within the context of density. This approach is especially relevant in Opportunity Areas where high quality regenerative development is sought and is expected to come forward in an evolving setting. Given the changing character of this central location adjacent to a town centre, it is considered that the proposed



density is to be welcomed, subject to compliance with other Policies and material planning considerations, in accordance with policy D3 of the London Plan.

### **Housing Mix and Affordable Housing**

Policy DMH2 Housing Mix of Hillingdon's Local Plan: Part 2 – Development Management Policies and policy H10 Housing size mix of the London Plan seek to ensure a practicable mix of housing units are provided within residential schemes. These policies are supported by the London Plan Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the low cost rented sector, and sets strategic guidance for Councils in assessing their needs.

Policy DMH7 Provision of Affordable Housing of Hillingdon's Local Plan: Part 2 – Development Management Policies states that 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% Affordable Rent and 30% Intermediate.

A Financial Viability Assessment accompanies this application – please refer to the same for details on the affordable housing offer. At present, the appraisal finds that the development is not viable to provide any affordable housing given that 2/3<sup>rd</sup>s of the site has been given over for public realm delivery. Notwithstanding this monumental contribution to the delivery of the wider masterplan and public infrastructure, the proposal will still manage to provide 73 family dwellings (62.9%) and more than 10% accessible units.

Given the constraints of the site and the huge contribution to the public realm, the overall housing mix of 43 x 1-bedroom units (37.1%), 55 x 2-bedroom units (47.4%) and 18 x 3-bedroom units (15.5%). This mix is considered justifiable and acceptable in this instance.

### **Impact on the character of the area & setting of listed buildings**

Strategic Policy S01 of the Local Plan: Part 1 seeks to conserve and enhance the Borough's heritage assets and their setting by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage assets, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

Strategic Policy HE1 of the Local Plan: Part 1 stipulates that the Council will conserve and enhance Hillingdon's distinctive and varied environment, its settings, and the wider historic landscape, which includes designated heritage assets such as conservation areas.

Strategic Policy BE1 of the Local Plan: Part 1 requires all new development to improve and maintain the quality of the built environment to create successful and sustainable neighbourhoods.

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.

The design rationale has been informed through pre-applications discussions and the emerging masterplan. Development of the site has been guided by the Green Super Highway and forms the focus of the impact on character of the area. The Green Super Highway forms as a connection along the wider site masterplan to

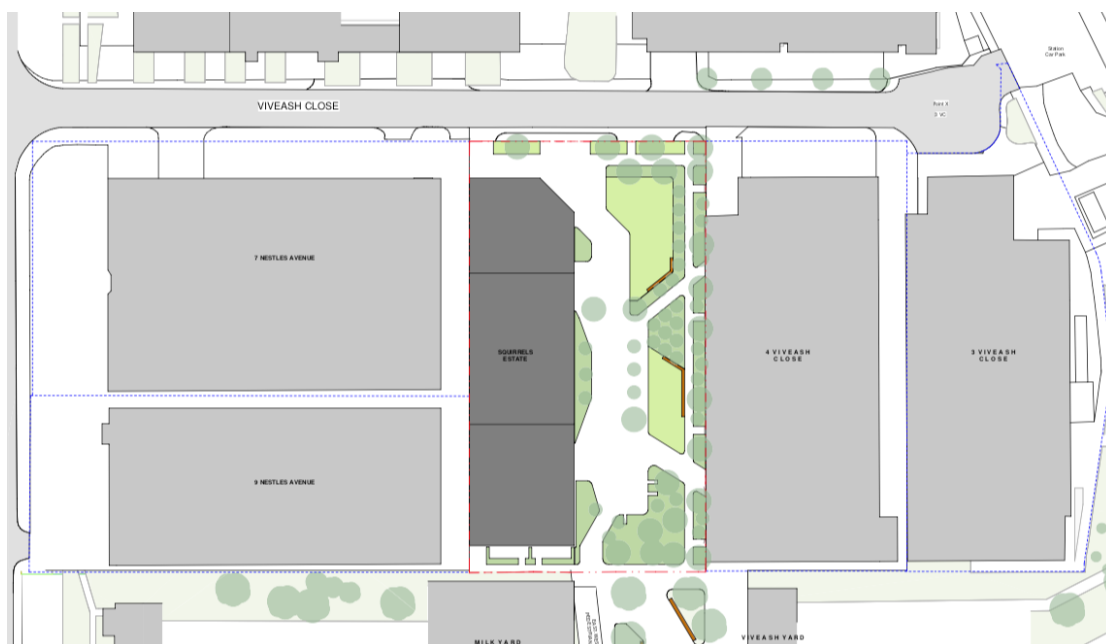


develop the pedestrian route from east to west.

The Green Super Highway forms the character of the master planned area and as such the design proposed is a logical design rationale when you consider the layout and form of neighbouring sites. The layout of this application site responds to this much better than the previous scheme proposed at pre-application by proposing a single steeped mass that would respond to the evolving pattern and scale of development in the immediate area and integrate with the building line of the Milk Yard.



*Masterplan Design Development for site "B"*



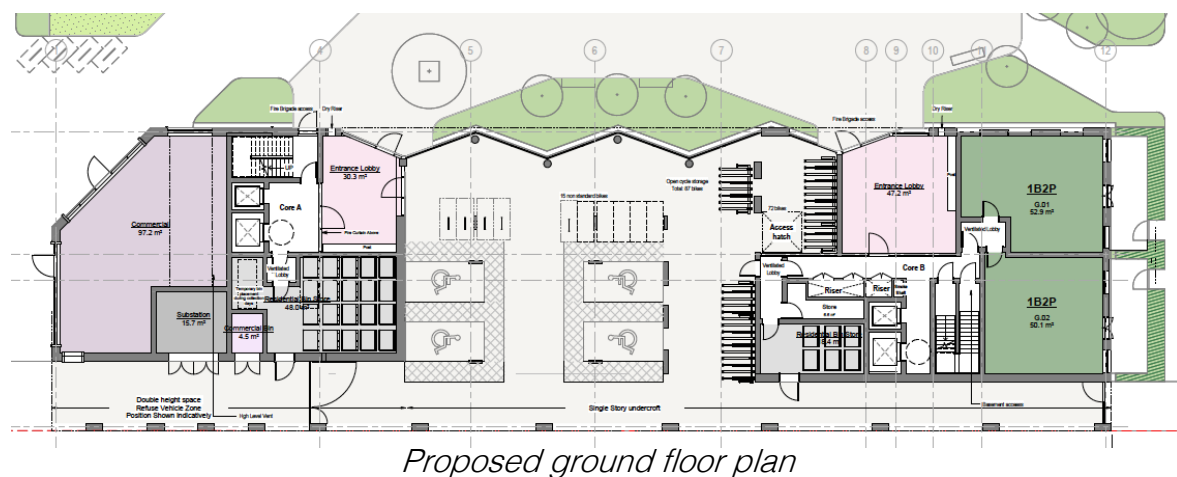
*Proposed Footprint*

The proposal incorporates a commercial unit at ground level on its southern flank. This will provide a 2-storey active frontage which will announce the site by the front of Viveash Close and the Green Super Highway. The western elevation features an undercroft to the accessible parking bays and general storage. Nevertheless, the fundamentals of the site lie in the East flank which is proposed to be designed to be set back in line with the boundary found at the under-construction Milk Yard. The proposal is surrounded by recently consented applications and as such the Squirrels Estate forms a significant link for the Green Super Highway.

Given the applicants interest in land parcels surrounding this site, it is expected this site will come forward swiftly which would assist deliver the masterplan promptly and assist unlock the Green Super Highway.

It is also worth mentioning that the Applicant is in discussions with the landowner to the North of the site regarding potentially building development that might be secured on this site. Therefore, there is greater opportunity to ensure that this wholistic approach is secured with the same build partner for more than just the application site.

Regarding defensible space, adequate distances at ground floor level have been provided for ground floor flats and more soft landscaping provided. In addition, the change to the layout from the previous proposal is more compatible with the surrounding context and provides more visual interest to each main elevation.



The site is not located within a Conservation Area but is adjacent to the Nestle, Hayes Conservation Area. The design of the development and the indicative masterplan has considered the impact on the setting of said conservation area.

The layout and design of this new scheme responds to the recently consented blocks at the adjacent Former Nestles Factory site. Also, it is important to consider that the existing building on site is extremely unsightly and makes a negative contribution to the setting of the conservation area. In contrast, the proposal is considered to enhance and safeguard the heritage value of the Nestle, Hayes Conservation Area. This is confirmed in the RPS heritage assessment report.



### *Day Two Masterplan Massing for Site "B"*

More generally in urban design terms, the proposed building would have a scale and built form from public vantage points that is compatible with this design approach that is accepted at these adjacent locations, whilst also making the most efficient use of this allocated Opportunity Area regeneration site.

The building would be set back sufficiently from the Green Super Highway and surrounding buildings / sites, to ensure it would not appear overbearing or dominant when viewed from public areas.

Further, the accompanying Daylight and Sunlight Assessment prepared by Waldrams, demonstrates that there would be no adverse impact on neighbouring properties.

Also, a Townscape Visual Impact Assessment (TVIA) prepared by GL Hearn shows that the proposed building would sit comfortably within the site and appear in keeping with the emerging character of the area.

In addition, its contemporary design and materiality would aid in reducing its height when viewed from its surroundings, helping to integrate it into the setting. For further consideration of the impact of the proposal on the visual amenity of the area, please refer to the accompanying Design and Access Statement prepared by TateHindle, however, it is opined that the proposal will provide a very high-quality façade design which is well articulated and matches the approaches evident at adjacent sites.

Based on the improved design and wider masterplan approach to the application site and overall site "B" area, the development proposal is acceptable in terms of its impact on the character and appearance of this regeneration area, in accordance with the Hillingdon Local Plan; the London Plan; and the NPPF.

For further consideration of design and the impact of the proposal on the visual amenity of the area, please refer to the accompanying Design and Access Statement (TateHindle) and Townscape Visual Impact Assessment (GL Hearn) which support this application.

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

Given the layout of the consented development in sites “A” and “C” of the site allocation (SA5) and the obvious Green Super Highway corridor running east-west, particular attention has been paid to the unlocking of land at the Squirrels Trading Estate, as this is the principal key to unlocking the entirety of SA5 and allowing these sites to come forward independently. Please refer to the accompanying Design and Access Statement which shows the evolution of the design and how to facilitate the Green Super Highway the site has been worked to step back in line with the adjacent built form and chamfers away from Viveash Close.

The scheme ensures that the distance complies with the Council’s 21m separation distance to the closest neighbouring residential properties (see below).



*Width of Green Super Highway*

The development has also been located to the adjacent site to the west, known as 7 and 9 Nestles Avenue. Given the design of the consented schemes is a blank façade, it is appreciated that this proposal would not prejudice these sites but instead respond to the masterplan.

The application site has the advantage of being located adjacent to several blank façades however, the Daylight, Sunlight and Overshadowing Assessment considers the wider site and Green Super Highway. It concludes that the quantitative analysis shows that all surrounding properties will have acceptable day and sunlight conditions with the proposals in place in line with BRE guidelines.



Overall, the proposal is considered to illustrate that there will no adverse impact on neighbouring properties. Therefore, the proposal is acceptable in terms of considerations relating to sunlight and daylight considerations both in terms of the public realm and neighbouring properties.

### **Living conditions for future occupiers/users**

#### Internal living space

The Government's national space standards contained in the Technical Housing Standards and policy 3.5 of the London Plan set out the minimum floor areas required for proposed residential units to ensure that they provide an adequate standard of living for future occupiers.

The development will exceed the minimum internal floor space standards of policy 3.5 of the London Plan and the Standards. Specific attention has been given to try to provide access to good levels of outlook and daylight. The drawings in the Design Document illustrate how all habitable rooms will have access to adequate outlook and daylight in accordance with the Mayor's Housing SPG.

The main build entrances would have level thresholds and the communal corridors would have a rational arrangement with the provision of lifts and a stair core to service the flats all being conveniently located.

Given the development's location near to existing commercial buildings (albeit temporarily), a Noise and Vibration Impact Assessment prepared by Syntegra accompanies this application which considers the impact that noise and vibration could have on the proposed development. Through an assessment of on-site noise and vibration measurements, the report concludes that through careful consideration of the building envelope construction, the proposed development should avoid future residents being exposed to harmful levels of noise and therefore, significant adverse impacts on the health of quality of life of those future residents would be avoided, in line with the aims of the NPPF.

Importantly, as the development would provide good protection from external noise for future residents, the development would not jeopardise the continued (albeit short-term) use of the commercial building immediately to the North. Future occupiers are also protected from possible future noise from the proposed ground floor commercial unit through appropriate envelope mitigation measures.

Overall, the proposed internal accommodation is of a high standard to the benefit of future occupiers, in accordance with Hillingdon's Local Plan; the London Plan, and the Mayor's Housing SPG.

#### Accessibility

As noted above, all main entrances to the development will have a level entrance and all units will be step free to their respective individual entrances. In addition, all flats will have WCs on the same level as their main living areas and entrances. The accompanying Design and Access Statement sets out that 12 units would be M4(3) whilst the remaining flats would be M4(2). The development proposal will therefore provide at least 10% of the flats as M4(3). Of these, most of the accessible units would be 1- and 2-bedroom units which are understood to be in particularly high demand.

Accessible parking bays will be conveniently located at ground level. The communal areas at ground and roof floor levels are accessible by wheelchair and the development would generally improve accessibility in and around the site.



It should be celebrated that this scheme would deliver a pivotal section of the Green Super Highway which will provide benefits for not just future residents, but all residents in adjacent developments. It will provide a means of access to the town centre and Elizabeth Line Station. Further, Hayes and Harlington Station have benefited from infrastructure improvements associated with Crossrail's delivery and is now a step free station.

The proposed commercial unit will also have step free access and the toilet would be accessible for future users.

Overall, the development places accessibility at its heart and the proposal will improve access in and around the site, in accordance with local, regional and national planning policies.

#### External Amenity Space & Public Open Space

Table 5.3 of policy DMBH18 Private Outdoor Amenity Space of the Local Plan Part 2 – Development Management Policies sets out the minimum level of private outdoor amenity space.

It stipulates that the minimum amenity space provision is 20 sqm for studio/1-bedroom units; 25 sqm for 2-bedroom units; and 30sqm for 3-bedroom units. The total amount of amenity space required is 2,775 sqm for the proposed development given its mix. The proposed development provides private balconies or terraces to all dwellings that exceed the Housing SPG in size and dimensions. They also comply with Hillingdon's standards regarding width and depth. The combined total of private external amenity space will be 671 sqm. At roof level, there is a communal garden measuring a further 395 sqm. At ground floor level, the development provides almost 2/3<sup>rd</sup> of the site as public open space with communal amenity space provided for future residents including the wider community measuring 1,890 sqm.

In total, the development would provide 2,956 sqm of external amenity space and a significant contribution towards public open space for the wider community.

The spaces also comply with Hillingdon's standards regarding width and depth. In total, the level of external amenity space will be 3,324 sqm which exceeds the quantum of amenity space required by 139sqm. The external amenity areas would comprise 3 distinct elements (see Design and Access Statement for more details) consisting of an open public space to the north in the form of the Green Super Highway; a communal roof terrace on the top level; and private balconies/terraces.

As this proposal provides more than the local requirement for external amenity space, it is considered that this development will be considered acceptable with regards to its external amenity space.

Almost 2/3<sup>rd</sup> of the site will be used as public open space with communal amenity space provided for future residents including the wider community. On this basis and given the proximity of the Grand Union Canal and local parks, the proposal is acceptable in terms of external amenity space provision, in accordance with local and regional planning policy.

As highlighted in the accompanying Landscaping Design and Access Statement, the development site would have an Urban Green Factor of 0.45, which is compliant with policy G5 of the London Plan and demonstrates the green credentials of the development proposals.

It is recognised that public open space is often a requirement of development of this nature where it forms part of larger regeneration. It is evident that the burden of this contribution has fallen almost entirely on this site, nonetheless, as set out in the masterplan the Green Super Highway would be deliverable within this site without requiring separate landowners to contribute to wider public open space.

Regarding children's play space, please refer to pages 31-32 of the accompanying Design and Access Statement prepared by Exterior Architecture.

## **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 considered and mitigated. Also, development proposals should not increase road danger.

A Transport Assessment has been prepared by Motion in support of this planning application. It includes an Active Travel Zone Assessment, PTAL Report and Swept Path Analysis. Alongside this Transport Assessment, a Framework Travel Plan and Delivery and Servicing Management Plan accompanies this submission.

The proposal includes a vehicular access to the site to be taken from the western side of the building which will lead to 4 parking spaces for vehicles with disabled occupants. The vehicular access will operate on a give way shuttle working operation with vehicles entering the site having priority and vehicles existing the site required to give way to vehicles entering the site.

The main pedestrian entrance to the site will be taken from the northern side of the site and will provide access to a courtyard area linking to the main pedestrian entrances.

The development provides critical east-west public links along the Green Super Highway to the front which will significantly reduce journey times to the station and town centre for neighbouring residents to the east. The public link will provide enhanced pedestrian and cycle routes through the heart of the development site.

Given the accessible location of the site, the proximity to Hayes and Harlington Station and the car free nature of the proposed development, it is considered that most person trips will be undertaken by sustainable modes of travel and only a very small number of trips will be by private car. A Framework Travel Plan also accompanies this submission which provides details of how sustainable travel choices will be encouraged amongst future users of the site and that measures that will be put in place will ensure sustainable travel choices are promoted.

As part of the overall master plan for Viveash Close, it is expected that the Council will request highway contributions to improve the adopted highway adjacent to the development site.

Subject to these measures, including those listed in the accompanying Active Travel Zone Assessment, the development is not considered to raise any highway safety concerns, it would not affect the free flow of traffic, and it would improve the capacity of the highway network, in the interests of the wider master plan area.

Deliveries and servicing associated with the proposed development will be obtained from Viveash Close with vehicles able to reverse into the site and wait off road, thereby ensuring the continued free flow of traffic on the public highway. Swept path analysis within the Transport Assessment demonstrates that expected delivery and servicing vehicles can manoeuvre into the loading bay safely and can stop to undertake deliveries and servicing activities. A Framework Delivery and Servicing Management Plan has been prepared and submitted with this application with details of how delivery and servicing activity associated with the development will be managed in an efficient and sustainable manner.

Refuse collection will be undertaken from this loading area created within the under-croft access on the building frontage on Viveash Close. Swept path analysis appended to the Transport Assessment illustrate how this can be carried out appropriately.

Dedicated bin stores are provided within the curtilage of the building. Waste will be trolleyed directly from the westernmost bin store to the refuse vehicle stopped on site. Waste stored within the easternmost bin stores will be transferred to the western bin store, by building management, on the day of collection and waste collection operatives will collect these bins from the western bin store. Site management will be responsible for transferring these bins back to the eastern bin store after collection.

Given the above, the development would have appropriate delivery and servicing arrangements, that would meet the needs of future occupiers/users without any adverse impact on transport infrastructure. Please refer to the accompanying Transport Assessment and associated documents for further details and consideration of the highway impacts of the development.

## Parking

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

Policy T6.1 Residential parking of the London Plan sets maximum standards and stipulates that the maximum level of parking for residential development in PTAL 3 in outer London is up to 0.75 parking spaces per unit.

The TfL tool gives the site a PTAL rating of 4. The London Plan recommends that sites in PTAL 4 should be 'car free' which usually equates to less than 0.1 space per unit for accessible users. Given the masterplan in place and a clear drive from the LPA to consider less parking in major schemes, a car free development with 4 accessible spaces is considered acceptable here.

The Council's recently adopted Local Plan sets out maximum parking space which do not take account of the public transport accessibility of sites which would limit the level of parking to approximately up to 1.5 spaces per dwelling.

Through discussions with the Local Planning Authority, and given the high public accessibility of the site, the Council as accepted on other surrounding sites is satisfied for this proposal to be a car free development, providing only accessible parking bays as required by the London Plan.

Table 10.3 'Maximum residential parking standards' of the London Plan states that the maximum parking provision for development at this location is 'car free', except for disabled persons parking. Paragraph G of Policy T6.1 Residential Parking states that residential development proposals as a minimum ensure that for 3% of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset.

The development as proposed would provide 4 on site accessible bays which equates to 3.5% provision. The Day 3 master plan study as set out in the accompanying Design and Access Statement shows where another 8 parking spaces could be delivered in the future as soon if existing provision is insufficient and more are needed by residents. The Council could and should secure this at planning stage through a S106 contribution.

As the site is in PTAL 4, located in proximity of Hayes Town Centre and a Crossrail Station, it seems an ideal location for a car free development. Therefore, this proposal is considered to comply with policy DMT6 Vehicle Parking of Hillingdon's Local Plan: Part 2 – Development Management Policies; and policy T6.1 of the London Plan.

## **Renewable Energy & 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 Couch Perry Wilkes 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% CO<sub>2</sub> 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.

### **Flooding or Drainage Issues**

The EA Flood Zone map shows that the site is in Flood Zone 1 which is the lowest risk level of flooding. Nevertheless, an FRA and drainage strategy has been prepared by Patrick Parsons and accompanies this application.

The FRA 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, also prepared by Patrick Parsons, concludes that the existing site has a well-connected drainage system. There is an existing 375mm connection pipe which runs adjacent to the highway of Viveash Close, the proposal adopts a strategy of discharging the surface water from the site to this sewer at a restricted rate. Patrick Parsons confirms the pipe would be suitable to do this with the surface water from the site being restricted to a maximum peak 5 l/s in line with best practice with the storage calculated to attenuate for the 1:100-year storm event range with a 40% allowance for climate change.

As part of the Green Super Highway delivery, a new surface water network will collect and store surface water within SUDs features. These features include a swale and rain garden network which forms as part of the landscaping.

Overall, the proposed drainage strategy for the development is considered acceptable and the risk from flooding is low, in accordance with policy EM6 Flood Risk Management of Hillingdon's Local Plan: Part 1; policy DME19 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.

### **Noise**

Policy EM8 'Land, Water, Air and Noise' of the Local Plan Part 1 – Strategic Policies; and policy D14 'Noise' 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 predominantly residential use. Adjacent sites are allocated to come forward for residential use and these are expected to be completed within the Council's identified 5-year land supply period. Therefore, when one factors in a possible 3-year build time, future occupiers are both unlikely to affect neighbouring commercial buildings as they simply will not be there or be affected by these commercial uses. Nevertheless, the accompanying Noise and Vibration Impact



Assessment finds that using on-site noise and vibration measurements including the careful consideration of the building envelope construction, the proposed development should avoid future residents being exposed to harmful levels of noise and therefore, significant adverse impacts on the health of quality of life of those future residents would be avoided, as required by the NPPF.

Importantly, as the development would provide good protection from external noise for future residents and given the distance, the development would not jeopardise the continued use of the commercial building immediately to the North in the short term. Future occupiers are also protected from possible future noise from the proposed ground floor commercial unit through appropriate envelope mitigation measures. Overall, the proposal is acceptable with regards to noise/vibration.

### **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. The accompanying Air Quality Assessment considers whether potential emissions from the development would be compliant with the air quality neutral requirements of the London Plan. The results show an acceptable level of building and transport emissions associated with 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.

### **Contamination and archaeology**

An Assessment has been prepared by Patrick Parsons. This assessment included a walkover survey of the site and a desk study, which included the view of a database search report (Groundsure Report, attached in Appendix) and historical Ordnance Survey Maps.

The site remains undeveloped until the 1938 map, at which point two buildings are present, with one building occupying the entire northern section of the Site whilst a

portion of the other building occupies the southern area of the Site. Given the existing use of the site, there is likely to be needed to carry out further on-site testing. On this basis and to safeguard future occupiers and users of the site, it would be acceptable for the Council to impose a standard condition relating to contamination, in compliance with the London Plan and the NPPF.

The site is not located within an Archaeological Priority Area. Nevertheless, as there is a small basement proposed within the development, both a Desk Based Archaeological Assessment and Basement Impact Assessment has been prepared to consider whether the scheme would lead to any adverse impact.

The Desk Based Archaeological Assessment prepared by RPS Group concludes that based on the generally limited archaeological potential of the study site and the likely severity of past ground disturbance, it is considered very unlikely that development proposals would have either a significant or widespread negative archaeological impact. Therefore, no further archaeological work is required.

The Basement Impact Assessment prepared by Patrick Parsons concludes that the proposed development will not present a problem for groundwater or subterranean drainage.

## **Conclusion**

In conclusion, there is Local and London Plan support for making more efficient use of sustainable, underutilised brownfield edge-of-town-centre sites within Opportunity Areas, for the delivery of housing, including affordable housing.

This proposal seeks to directly resolve concerns and advice made through the LPAs pre-application response, and provides evidence to demonstrate that the design approach can enable the delivery of this development and neighbouring developments in site "B" of SA 5 of the Local Plan specifically and fundamentally delivery of the Green Super Highway.

The design draws inspiration from the adjacent consented schemes and the current pending (approved at Committee) application at No. 3 Viveash Close (a site also owed by the applicant).

The emerging character/heritage of the local area, Grand Union Canal and the Green Super Highway have been significant driving forces influencing the design rationale. The scheme will deliver genuine improvements to the streetscape and general character of the area through the provision of modern, sensitively designed buildings, and enable site "B" of SA 5 to come forward delivering potentially 500 residential units (some 200 units more than its allocation). See 'Principle of Development' section of this report for more details.

It is clear from the Inspector's decision on the previous application at 3 Viveash Close that the key to unlocking site "B" of SA 5 is to ensure that the Squirrels Trading Estate parcel of land can come forward independently and at an appropriate quantum that fits with the wider context and evolving masterplan. This application goes to support this vision by delivering the critical Green Super Highway and providing evidence as to how this will link in terms of landscaping and build line across the site allocation of site B, whilst also delivering 116 units to ensure it is viable.

This statement should be read alongside the accompanying reports submitted with this application, including the Design and Access Statement prepared by TateHindle and the Sustainability Appraisal/Infrastructure Assessment prepared by Progress Planning.

The accompanying Sustainability Appraisal explains that some of the positive impacts of the development are:

- Reuse of previously developed (brownfield) land
- Achieving the long envisaged, challenging delivery of this part of the Housing Zone, making a significant contribution towards the Borough's housing need and supply, including a broad range of unit types with a significant proportion of family sized dwellings
- Acting as a catalyst for the wider masterplan area to come forward, thereby providing a larger range of positive impacts including more public open space and much needed housing
- New high quality housing with no north facing single aspect units and compliant levels of internal and external private amenity spaces
- Over 10% new wheelchair accessible flats to be provided
- New and improved areas of open space and enhanced Public Access Improvements that will provide better connectivity for the wider masterplan area with more direct links to the Crossrail Station and Hayes Town Centre.
- New development designed to reduce the impacts of climate change.
- A net gain in biodiversity and ecological improvements
- The integration of the site into the existing and emerging townscape, as well as creating a new architectural identity that will enhance the visual amenity of the area and is more compatible with the changing character of this regeneration area (Housing Zone).
- Flood and drainage improvements that will reduce the risk of flooding on and surrounding the site
- The provision of commercial floorspace which will provide flexible business floorspace for the local area and provide a community focal point
- Full Secured by Design accreditation and better natural surveillance of the surrounding area, including of the new civic plaza expected to be delivered to the North
- Economic benefits from additional spend by new residents in the local area and businesses
- Financial contributions secured under Section 106 contributions (TBC), including highway infrastructure improvements
- Significant annual retail and leisure expenditure by future residents in the local
- Significant amount of council tax receipts
- A significant number of (temporary) construction jobs as well as a modest number of (permanent) jobs once the development is operational

The design approach for the site is considered to address all the previous concerns - specifically in relation to the delivery of the Green Super Highway.

Overall, the approach to this development would reflect the 17 global goals of sustainable development as set out in the NPPF. The application meets the strategic policy objectives of the London Plan as well as the aims and objectives of the Local Plan.