

26th April 2023

169/02.4 Planning Statement

53-55 STATION ROAD, HAYES UB3 4BE

1.0 INTRODUCTION

1.1 POQ Architects have been instructed by Rubato Ltd to submit a full planning application for demolition of the existing L shaped retail building and replacement with a 2-storey retail unit and 3 storey residential block housing 17 flats at 53-55 Station Road, UB4

1.2 The application comprises the following plans:

- Existing Measured Survey Drawings
- Proposed Plans, indicating disabled parking, cycle storage and bin store(s)
- Proposed Elevations
- Proposed 3D model elevations

Together with the following documents:

- Planning application form
- This Planning Statement
- Design and Access Statement
- Environment Agency Flood Map for Planning

1.3 The application proposes the erection of a 2 storey retail block and a separate 3-storey accommodation block comprising 17 dwellings, all in the location of the existing L shaped building on this site. The site plan incorporates secure cycle storage, 2x integrated communal bin stores together with 2 disabled parking bays. The design of the building reflects the desired contemporary aesthetic, in acknowledgement of its location directly opposite a larger site that has been approved for phased residential development.

1.4 The purpose of this Statement is to provide the planning case in support of the development and in doing so it is necessary firstly to consider the application site and its planning status and constraints, before examining the case as to why planning permission should be granted in terms of planning policy and relevant planning issues.

1.5 The Planning Statement can be read in conjunction with the Design and Access Statement, which has been submitted to demonstrate that the Development Proposal is based on a well-thought-out design process.

2.0 SITE CONTEXT AND PLANNING HISTORY

- 2.1 Hayes is an area within Greater London adjacent to Uxbridge that has a range of services and facilities with good links to London from any of the local rail stations.
- 2.2 The site lies near the Grand Union Canal, which is to the South, and is bounded by the A312 to the East, which is an A road in England, running across west London from Hampton to Harrow. Its status varies from a local urban street to a major dual carriageway in Hayes. To the North and East are various retail shops and eateries as befitting any town, all in a highly sustainable High Street location.
- 2.3 The site is not in a Flood Zone or conservation area, and there are no Listed Buildings nearby.
- 2.4 Planning History. The subject site is within an established commercial area that has not been the subject of any recent relevant planning applications. However, the large site directly opposite on Crown Close (76550/APP/2021/4499) has been approved for phased residential development.

3.0 PLANNING POLICY CONTEXT

National Policy Context

- 3.1 In July 2021, the Ministry of Housing, Communities and Local Government updated the National Planning Policy Framework (NPPF). The NPPF is a material consideration in planning decisions.
- 3.2 The NPPF lists economic, social, and environmental objectives as the three dimensions to sustainable development:
- 3.3 The ***economic objective*** requires that the planning system contributes to building a strong, responsive, and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
- 3.4 The ***social objective*** requires that the planning system supports the creation of strong, vibrant, and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high-quality built environment, with accessible local services that reflects the community's needs and supports its health, social and cultural well-being.
- 3.5 The ***environmental objective*** expects planning to contribute to protecting and enhancing our natural, built, and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low s

development is the overriding message of the NPPF, meaning development proposals that are in accordance with the development plan should be approved without delay. The NPPF is a material consideration in planning decisions.

- 3.7 The Government attaches importance to the **design** of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Planning decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. Government also requires **decision taking** to be approached in a positive way to foster the delivery of sustainable development. Local Planning Authorities should look for solutions rather than problems, and decision takers at every level should seek to approve applications for sustainable development where possible.
- 3.8 In addition to the NPPF, the following documents will be of material consideration in the assessment of any planning application:
- National Planning Practice Guidance (NPPG)
 - London Plan (2021)
 - The London Borough of Hillingdon Local Plan Part 2 Development Management Policies (2020)
 - S106 Supplementary Planning Document
 - London Borough of Hillingdon Strategic Housing Market Assessment Update (2018)
 - Communities Infrastructure Levy Regulations (2010) and Draft Amendments (2020)
 - 5 Year Supply of Deliverable Housing Sites 2021/2022 – 2025/2026 (2022)

4.0 ASSESSMENT AND JUSTIFICATION OF THE APPLICATION PROPOSAL

- 4.1 The main planning issues are the principle of the development including loss of employment land, design and sustainability, affordable housing, highway safety, flood risk and drainage, noise, and contamination. These issues are addressed below in relation to their compliance with policy.
- 4.2 Principle of Development. The redevelopment of this site has already been the subject of discussion and advice through our Pre-Application Advice submission. (77603/PRC/2022/216)
- 4.3 The principle of flatted development in the immediate area has also been established by:
- 76550/APP/2021/4499

- 4.4 At our pre-app meeting the Officer team advocated for the retention of as large a retail unit (across ground and 1st floor) as is feasible, with the primary elevation being onto Station Road only. With regards to servicing, we propose all deliveries for this retail unit would be via its main Station Road entrance, as is the case for most similar scale retail premises that occupy Station Road.
- 4.5 Design and Sustainability. The Design and Access Statement explains how the opportunity has been taken to reflect a slightly more contemporary architecture in the design of the building facing onto Crown Close. This will help establish the character of this part of Hayes off Station Road. Furthermore, the development is still accommodated in the overall local character by being of domestic scale with 3 storeys, flat roof and a low-key visual impact that is very similar to the bulk of the existing building which it replaces.
- 4.6 Sustainability has been considered at the planning stage and appropriate design and energy interventions have been discussed including a potential SuDS drainage strategy that attenuates rainwater in below ground storage tanks. At the detailed design stage, specifications for the building will include low flow taps and showers, low energy lighting, high levels of insulation, etc. It is anticipated that the specification could be required to be finalised by planning condition.
- 4.7 Affordable Housing. Whilst the design meets the Council's aspirations for space standards, a proportion could also be amended to meet the Lifetime Homes standard, which has greater space requirements for wheelchair accessibility including circulation space and bathroom space, and lift access to upper floors. Additionally, it is our experience that Registered Providers (Housing Associations) do not wish to take over parts of buildings, since they would not have control over all the occupiers and the communal spaces. To provide a viable % of flats as affordable units, we propose the apartments accessed by L2 be entirely affordable, whilst L1 could be entirely market units. An alternate approach could be an agreement to commit to a commuted sum payable to the Council through a S106 agreement and calculated by the Affordable Housing Contribution laid out in the S106 Supplementary Planning Document.
- 4.8 The development's design with 2no circulation cores delivers multiple smaller dwellings that will offer affordability in addition to larger family accommodation, some of which benefit from dedicated rear gardens at ground floor together with a private entrance onto Crown Close.
- 4.9 Highway Safety. Please see the Access section of the Design and Access Statement submitted with this application for a summary of the highway issues associated with the development. The development complies with the current provisions (as set out in the London Plan) for car and cycle parking provision within the site boundary. At Pre-Application the advice received was that the residential development would be expected to be 'car lite' and no future residents would be eligible for a parking permit, since the site is highly sustainable. Furthermore, the applicant proposes that

that 50% (or 1 of 2) of the total car parking provision will have active EV charge points with the other bay installed with passive provision in line with the standards set out in the London Plan.

- 4.10 Flood Risk and Drainage. The site does not lie in a Flood Risk zone and is advised by the Environment Agency as being cited in Zone 1. Land within flood zone 1 has a low probability of flooding from rivers and the sea. Most developments that are less than 1 hectare (ha) in flood zone 1 do not need a flood risk assessment (FRA) as part of a planning application. This site is measured as circa 0.12 ha. However, since the existing building footprint is the same as the site area, the proposed development will represent an improvement by introducing previously impermeable areas with either permeable block paving (front and rear courtyards) or grass, thereby allowing an element of infiltration drainage that was not previously possible in this urban location.
- 4.11 Mains foul drainage is proposed via a connection into the existing sewer on Crown Close. The applicant agrees to route the foul drainage from the proposed flats via new sewage connection(s).
- 4.12 Noise. A noise assessment has yet to be produced.
- 4.13 It is requested that the Council acknowledges the development can be designed to be accommodated satisfactorily in noise terms and considers a planning condition to any consent to require a noise assessment to be carried out and results incorporated into the detailed design, for approval by the Council prior to development.
- 4.14 Contaminated Land. The application is not accompanied by a ground investigation report.
- 4.15 It is requested that the Council acknowledges the development can be designed to be accommodated satisfactorily in contamination terms and considers a planning condition to any consent to require a ground investigation report to be carried out and results incorporated into the detailed design, for approval by the Council prior to development, that most probably supports an infiltration drainage solution for rain and surface water.

5.0 CONCLUSION

- 5.1 The site is in a sustainable location and the proposed development will make the best use of the site for a replacement retail building and an attractive and useful flatted development by reflecting the character and appearance of the area. The proposed development complies with relevant policies of the Local Plan and with the NPPF. Technical issues such as noise and contamination can be mitigated. It is therefore requested that the application be approved.

- 5.2 If the officer has any queries about the application please do not hesitate to get in touch.